

1SFR INVESTMENTS POOL 1, LLC, a<br/>Nevada limited liability company,2Counterclaimant/Cross-Claimant,3vs.4vs.5JPMORGAN CHASE BANK, N.A.;<br/>DANIEL A. RICHARD, an individual,6Counter-Defendant/Cross-Defendants.

Pursuant to LR IA 6-1 and LR 26-4, Plaintiff/Counter-Defendant JPMorgan 8 9 Chase Bank, N.A. ("Chase"), Defendant/Counterclaimant/Cross-Claimant SFR Investments Pool 1, LLC ("SFR"), and The Willows Homeowners Association 10 ("Willows"), by and through their respective counsel of record, stipulate and request 11 that this Court extend discovery and dispositive motion deadlines in the above-12captioned case for 60 days, to permit the parties to complete party depositions, and specifically the deposition of Chase, whose designated witness must undergo significant surgery in December, from which she will not have recuperated until at least the end of January or beginning of February 2018. The parties have conferred and agree that this brief extension is the most reasonable way to complete discovery 1718in this case, including so that Chase's designated witness has sufficient time to attend to necessary medical treatment. 19

This is the parties' second request for an extension to the scheduling order deadlines, which were submitted in compliance with LR 26-1. The parties make this request in good faith and not for purposes of delay.

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## I. <u>Discovery Completed to Date</u>

To date, Chase has served the following discovery: initial disclosures; initial expert disclosure; requests for production to SFR; interrogatories to SFR; notice of Rule 30(b)(6) deposition of SFR; requests for production to Willows; interrogatories to Willows; notice of Rule 30(b)(6) deposition of Willows; subpoena to produce documents on non-party Absolute Collection Services, LLC; and subpoena to testify 1 at a deposition on non-party Absolute Collection Services, LLC.

 $\mathbf{2}$ To date, SFR has served the following discovery: initial disclosures; requests 3 for production to Chase; interrogatories to Chase; requests for admission to Chase; and notice of Rule 30(b)(6) deposition of Chase. SFR has also responded to Chase's 4 5requests for production and interrogatories to SFR.

6 To date Willows has served the following discovery: requests for production to 7 Chase; interrogatories to Chase; and requests for admission to Chase.

Β. Specific Description of Discovery that Remains to be Completed

9 SFR has noticed a Rule 30(b)(6) deposition of Chase. As discussed below, however, the parties seek to reschedule Chase's deposition to occur after the current 10 discovery cutoff of January 4, 2018.<sup>1</sup> Chase has also noticed depositions of SFR, 11 Willows, and non-party Absolute Collection Services, LLC. Chase is currently 12preparing its responses/objections to SFR's requests for admission to Chase, requests for production to Chase, and interrogatories to Chase. Chase is also currently preparing its responses/objections to Willows's requests for admission to Chase, 16requests for production to Chase, and interrogatories to Chase. Willows is currently preparing its responses/objections to Chase's requests for production to Willows and 1718 interrogatories to Willows.

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## Good Cause Exists for the Requested Extension **C**.

20SFR has noticed Chase's deposition for December 12, 2017, but Chase's Rule 2130(b)(6) designee is unavailable on this date because the designee will be undergoing 22significant surgery in December, from which she will need to recuperate until at least 23the end of January or beginning of February 2018. The parties have met and 24conferred about rescheduling Chase's deposition in this lawsuit to take place during 25the week of February 12-16, 2018, when the Chase designee should be recuperated

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<sup>&</sup>lt;sup>1</sup> The parties further reserve their rights to meet and confer and, if necessary, engage 27in motion practice regarding any discovery issues that may arise.

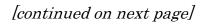
1 from surgery and able to travel to Las Vegas. This is the parties' second request to 2 extend the standard, 180-day discovery period in this case, and they seek the 3 extension so that Chase's designated witness may have an opportunity to receive 4 necessary medical treatment and recover from the same. The parties have diligently 5 engaged in discovery to date and seek this extension in good faith.

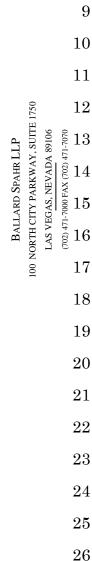
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## D. <u>Proposed Discovery Deadlines</u>

7 The parties request an order extending the close of discovery, the deadline to
8 file dispositive motions, and the deadline to file a pre-trial order by 60 days.

| Event               | Current Deadline <sup>2</sup> | New Deadline  |
|---------------------|-------------------------------|---------------|
| Close of Discovery  | January 4, 2018               | March 5, 2018 |
| Dispositive Motions | February 5, 2018              | April 5, 2018 |
| Pre-Trial Order     | March 2, 2018                 | May 2, 2018   |





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<sup>2</sup> See Scheduling Order, ECF No. 50.

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|---|---|--|--|
| 22  | ORDER   |  |  |
|   | IT IS SO ORDERED:   |  |  |
|   |   |  |  |
| 25  | UNITED STATES MAGISTRATE JUDGE  |  |  |
| 26  |   | December 18, 2017  |  |
| 27  | DATED: December 18, 2017  |  |  |
| 28  | DMWEST #17301411 v1   | 5  |  |