

BALLARD SPAHR LLP  
100 NORTH CITY PARKWAY, SUITE 1750  
LAS VEGAS, NEVADA 89106  
(702) 471-7000 FAX (702) 471-7070

1 Abran E. Vigil, Esq.  
Nevada Bar. No. 7548  
2 Maria A. Gall, Esq.  
Nevada Bar No. 14200  
3 Lindsay C. Demaree, Esq.  
Nevada Bar No. 11949  
4 Kyle A. Ewing, Esq.  
Nevada Bar. No. 14051  
5 BALLARD SPAHR LLP  
100 North City Parkway, Suite 1750  
6 Las Vegas, Nevada 89106  
Telephone: (702) 471-7000  
7 Facsimile: (702) 471-7070  
vigila@ballardspahr.com  
8 gallm@ballardspahr.com  
demareel@ballardspahr.com  
9 ewingk@ballardspahr.com

10 *Attorneys for JPMorgan Chase Bank, N.A.*

11  
12 **UNITED STATES DISTRICT COURT**  
13 **DISTRICT OF NEVADA**

14 JPMORGAN CHASE BANK, N.A.,  
15 Plaintiff,

Case No. 2:17-CV-00334-RFB-PAL

16 vs.

**STIPULATION AND ORDER TO  
EXTEND SCHEDULING ORDER  
DEADLINES BY 30 DAYS**

17 SFR INVESTMENTS POOL 1, LLC, a  
Nevada limited liability company;  
18 TRAIL RIDGE COMMUNITY  
ASSOCIATION, a Nevada non-profit  
19 corporation; LIZZY HOLBROOK, an  
individual.

(First Request)

20 Defendants.

22 SFR INVESTMENTS POOL 1, LLC, a  
23 Nevada limited liability company,  
24 Counterclaimant/Cross-Claimant,

25 vs.

26 JPMORGAN CHASE BANK, N.A.;  
LIZZY HOLBROOK, an individual,  
27 Counter-Defendant/Cross-Defendant.  
28

1 Pursuant to LR IA 6-1 and LR 26-4, Plaintiff/Counter-Defendant JPMorgan  
2 Chase Bank, N.A. (“Chase”), Defendant/Counterclaimant/Cross-Claimant SFR  
3 Investments Pool 1, LLC (“SFR”), and Defendant Trail Ridge Community Association  
4 (“Trail Ridge”),<sup>1</sup> by and through their respective counsel of record, stipulate and  
5 request that this Court extend discovery and dispositive motion deadlines in the  
6 above-captioned case for 30 days, to permit the parties to efficiently complete party  
7 depositions and outstanding written discovery. The parties have conferred and agree  
8 that this brief extension is the most reasonable, most economical, and least  
9 burdensome way to complete discovery in this case.

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

13 **A. Discovery Completed to Date**

14 To date, Chase has served the following discovery: initial disclosures; initial  
15 expert disclosure; requests for production to SFR; interrogatories to SFR; notice of  
16 Rule 30(b)(6) deposition of SFR; requests for production to Trail Ridge;  
17 interrogatories to Trail Ridge; notice of Rule 30(b)(6) deposition of Trail Ridge;  
18 subpoena to produce documents on non-party Alessi & Koenig, LLC; and subpoena to  
19 testify at a deposition on non-party Alessi & Koenig, LLC.

20 To date, SFR has served the following discovery: initial disclosures.

21 To date Trail Ridge has served the following discovery: initial disclosures.

22 **B. Specific Description of Discovery that Remains to be Completed**

23 Chase is awaiting responses to the discovery requests it served, and SFR  
24 anticipates that it will soon be serving discovery requests upon Chase. In addition,

25 \_\_\_\_\_  
26 <sup>1</sup> Although Defendant/Cross-Defendant Lizzy Holbrook waived service of the  
27 Summons and Complaint in this litigation (*see* ECF No. 7), Ms. Holbrook has not  
28 otherwise appeared, and therefore, this stipulation and order is submitted without  
her signature.

1 they are working to schedule party and non-party depositions. Chase has scheduled  
2 the deposition of non-party Alessi & Koenig, LLC for November 27, 2017 and of  
3 Defendant Trail Ridge for November 28, 2017 and of Defendant SFR for November  
4 29, 2017. SFR has also noticed a Rule 30(b)(6) deposition of Chase. As discussed  
5 below, however, the parties seek to schedule Chase's deposition and to reschedule to  
6 occur after the current discovery cutoff of November 29, 2017.<sup>2</sup>

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

8 Good cause exists for the requested extension, as it will provide time for the  
9 parties to complete written discovery and schedule depositions in a way that  
10 minimizes burden and increases efficiency. SFR has noticed Chase's deposition for  
11 November 29, 2017, but Chase's Rule 30(b)(6) designee is unavailable on this date  
12 because the designee will be testifying in five other depositions in similar lawsuits  
13 involving Chase and SFR, on not only November 29 but also on November 28 and 30.  
14 The parties have met and conferred about rescheduling Chase's deposition in this  
15 lawsuit to take place during the week of December 11-15, 2017, when the Chase  
16 designee will be available and again in Las Vegas. This approach will significantly  
17 minimize the cost and burden to the witness. This is the parties' first request to  
18 extend the standard, 180-day discovery period in this case, and they seek only a brief  
19 30-day extension. The parties have diligently engaged in discovery to date and seek  
20 this extension in good faith.

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27 <sup>2</sup> The parties further reserve their rights to meet and confer and, if necessary, engage  
28 in motion practice regarding any discovery issues that may arise.

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**D. Proposed Discovery Deadlines**

The parties request an order extending the close of discovery, the deadline to file dispositive motions, and the deadline to file a pre-trial order by 30 days.

<b>Event</b>	<b>Current Deadline<sup>3</sup></b>	<b>New Deadline</b>
Close of Discovery	November 29, 2017	December 29, 2017
Dispositive Motions	December 29, 2017	January 29, 2018
Pre-Trial Order	January 29, 2018	March 1, 2018

*[continued on next page]*

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<sup>3</sup> See Scheduling Order, ECF No. 24.

1 This extension is reasonable and necessary given the good cause set forth  
2 above.

3 **IT IS SO STIPULATED.**

4 Dated: November 8, 2017

5 BALLARD SPAHR LLP

KIM GILBERT EBRON

6 By: /s/ Maria A. Gall  
7 Abran E. Vigil, Esq.  
8 Nevada Bar. No. 7548  
9 Maria A. Gall, Esq.  
10 Nevada Bar No. 14200  
11 Lindsay C. Demaree, Esq.  
12 Nevada Bar No. 11949  
13 Kyle A. Ewing, Esq.  
14 Nevada Bar. No. 14051  
15 100 North City Parkway, Suite 1750  
16 Las Vegas, Nevada 89106

By: /s/ Diana S. Ebron  
Diana S. Ebron, Esq.  
Nevada Bar No. 10580  
Jacqueline A. Gilbert, Esq.  
Nevada Bar No. 10593  
Karen L. Hanks, Esq.  
Nevada Bar No. 9578  
7625 Dean Martin Dr., Suite 110  
Las Vegas, Nevada 89139

12 *Attorneys for Plaintiff/Counter-*  
13 *Defendant JPMorgan Chase Bank, N.A.*

*Attorneys for Defendant/Counter-*  
*Claimant/Cross-Claimant SFR*  
*Investments Pool 1, LLC*

14 BOYACK ORME & ANTHONY

15 By: /s/ Christopher B. Anythong  
16 Edward D. Boyack, Esq.  
17 Nevada Bar No. 5229  
18 Adam J. Breeden, Esq.  
19 Nevada Bar No. 8768  
20 Christopher B. Anthony  
21 Nevada Bar No. 9748  
22 7432 W. Sahara Ave., Ste. 101  
23 Las Vegas, Nevada 89117

21 *Attorneys for Trail Ridge Community*  
22 *Association*

**ORDER**

**IT IS SO ORDERED:**

  
UNITED STATES MAGISTRATE JUDGE

DATED: November 14, 2017

BALLARD SPAHR LLP  
100 NORTH CITY PARKWAY, SUITE 1750  
LAS VEGAS, NEVADA 89106  
(702) 471-7000 FAX (702) 471-7070

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 8, 2017, a true copy of the foregoing  
**STIPULATION AND ORDER TO EXTEND SCHEDULING ORDER DEADLINES**  
**BY 30 DAYS** was served via U.S. Mail, postage-pre-paid on the following:

Lizzy Holbrook  
9220 Red Knoll  
Las Vegas, Nevada 89113

/s/ Mary Kay Carlton  
An Employee of Ballard Spahr LLP