

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**

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

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 60 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.

(Second 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.;
 27 LIZZY HOLBROOK, an individual,
 28 Counter-Defendant/Cross-Defendant.

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”),¹ 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 60 days, to permit the parties to complete party depositions,
7 and specifically the deposition of Chase, whose designated witness must undergo
8 significant surgery in December and from which she will not have recuperated until
9 at least the end of January or beginning of February 2018. The parties have
10 conferred and agree that this brief extension is the most reasonable way to complete
11 discovery in this case, including so that Chase’s designated witness has sufficient
12 time to attend to necessary medical treatment.

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

16 **A. Discovery Completed to Date**

17 To date, Chase has served the following discovery: initial disclosures; initial
18 expert disclosure; first set of requests for production to SFR; second set of requests
19 for production to SFR, interrogatories to SFR; notice of Rule 30(b)(6) deposition of
20 SFR; first set of requests for production to Trail Ridge; second set of requests for
21 production to Trail Ridge; interrogatories to Trail Ridge; notice of Rule 30(b)(6)
22 deposition of Trail Ridge; subpoena to produce documents on non-party Alessi &
23 Koenig, LLC; and subpoena to testify at a deposition on non-party Alessi & Koenig,
24 LLC. In addition, Chase has taken the deposition of SFR, Trail Ridge, and Alessi &

25
26 ¹ 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 Koenig, LLC.

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;
4 and notice of Rule 30(b)(6) deposition of Chase. SFR has also responded to Chase's
5 requests for production and interrogatories to SFR.

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

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

8 SFR has also noticed a Rule 30(b)(6) deposition of Chase. As discussed below,
9 however, the parties seek to reschedule Chase's to occur after the current discovery
10 cutoff of December 29, 2017.² Chase is currently preparing its responses/objections to
11 SFR's requests for admission to Chase, requests for production to Chase, and
12 interrogatories to Chase. Trail Ridge is currently preparing its responses/objections
13 to Chase's requests for production to Trail Ridge and interrogatories to Trail Ridge.

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

15 SFR has noticed Chase's deposition for December 12, 2017, but Chase's Rule
16 30(b)(6) designee is unavailable on this date because the designee will be undergoing
17 significant surgery in December, from which she will need to recuperate until at least
18 the end of January or beginning of February 2018. The parties have met and
19 conferred about rescheduling Chase's deposition in this lawsuit to take place during
20 the week of February 12-16, 2018, when the Chase designee should be recuperated
21 from surgery and able to travel to Las Vegas. This is the parties' second request to
22 extend the standard, 180-day discovery period in this case, and they seek the
23 extension so that Chase's designated witness may have an opportunity to receive
24 necessary medical treatment and recover from the same. The parties have diligently
25 engaged in discovery to date and seek this extension in good faith.

26 _____
27 ² 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.

Event	Current Deadline³	New Deadline
Close of Discovery	December 29, 2017	February 28, 2018
Dispositive Motions	January 29, 2018	March 29, 2018
Pre-Trial Order	March 1, 2018	May 1, 2018

[continued on next page]

³ 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: December 11, 2017

5 BALLARD SPAHR LLP	KIM GILBERT EBRON
6 By: <u>/s/ Maria A. Gall</u>	By: <u>/s/ Diana S. Ebron</u>
7 Abran E. Vigil, Esq.	Diana S. Ebron, Esq.
8 Nevada Bar. No. 7548	Nevada Bar No. 10580
9 Maria A. Gall, Esq.	Jacqueline A. Gilbert, Esq.
10 Nevada Bar No. 14200	Nevada Bar No. 10593
11 Lindsay C. Demaree, Esq.	Karen L. Hanks, Esq.
12 Nevada Bar No. 11949	Nevada Bar No. 9578
13 Kyle A. Ewing, Esq.	7625 Dean Martin Dr., Suite 110
14 Nevada Bar. No. 14051	Las Vegas, Nevada 89139
15 100 North City Parkway, Suite 1750	
16 Las Vegas, Nevada 89106	

12 <i>Attorneys for Plaintiff/Counter-</i>	<i>Attorneys for Defendant/Counter-</i>
13 <i>Defendant JPMorgan Chase Bank, N.A.</i>	<i>Claimant/Cross-Claimant SFR</i>
	<i>Investments Pool 1, LLC</i>

14 BOYACK ORME & ANTHONY

15 By: /s/ Edward D. Boyack

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*

23 **ORDER**

24 **IT IS SO ORDERED:**

25 

26 UNITED STATES MAGISTRATE JUDGE

27 DATED: January 29, 2018

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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 December 11, 2017, a true copy of the foregoing
**STIPULATION AND ORDER TO EXTEND SCHEDULING ORDER DEADLINES
BY 60 DAYS (Second Request)** 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