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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

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JPMORGAN CHASE BANK, N.A.

Plaintiff,

vs.  
SFR INVESTMENTS POOL 1, LLC, a  
Nevada limited liability company; CASA  
PALERMO 20N HOMEOWNERS'  
ASSOCIATION, a Nevada non-profit  
corporation; and FARANAK  
PANAHBARHAGH, an individual.

Defendants.

Case No. 2:17-CV-00342-GMN-VCF

Stipulation and Order to  
Extend Scheduling Order  
Deadlines by 60 Days

(First Request)

SFR INVESTMENTS POOL 1, LLC, a  
Nevada limited liability company,

Counter/Cross-Claimant,

vs.  
JPMORGAN CHASE BANK, N.A. and  
FARANAK PANAHBARHAGH, an  
individual,

Counter/Cross-Defendants.

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”), Defendant Casa Palermo 20N Homeowners’  
4 Association (“Casa Palermo”), and Defendant Faranak Panabarhagh, by and through  
5 their respective counsel of record, stipulate and request that this Court extend  
6 discovery and dispositive motion deadlines in the above-captioned case for 60 days, to  
7 permit the parties to complete party depositions, and specifically the deposition of  
8 Chase, whose designated witness underwent significant surgery in December, from  
9 which she will not have recuperated until at least the end of January or beginning of  
10 February 2018. The parties have conferred and agree that this brief extension is the  
11 most reasonable way to complete discovery in this case, including so that Chase’s  
12 designated witness has sufficient time to attend to necessary medical treatment and  
13 recuperate before traveling to Las Vegas for her depositions in not only this action  
14 but numerous other lawsuits between Chase and SFR involving homeowners’  
15 association foreclosure sales.

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

19 **A. Discovery Completed to Date**

20 To date, Chase has served the following discovery: its initial disclosure of  
21 documents and witnesses and its initial expert disclosure.

22 To date, SFR has served the following discovery: its initial disclosure of  
23 documents and witnesses and notice of Rule 30(b)(6) deposition of Chase and notice  
24 of deposition of Faranak Panabarhagh.

25 To date, Casa Palermo has served its initial disclosure of documents and  
26 witnesses.

27 To date, Faranak Panabarhagh has served her initial disclosure of documents  
28 and witnesses.

1                   Moreover, on December 18, 2017, the Parties filed their interim status report.

2                   See ECF No. 41.

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

4                   SFR has noticed a Rule 30(b)(6) deposition of Chase for January 10, 2017. As  
5                   discussed below, however, the parties seek to reschedule Chase's deposition to occur  
6                   after the current discovery cutoff of February 16, 2018.<sup>1</sup> Chase plans to notice  
7                   depositions of SFR, Casa Palermo, and non-party Alessi & Koenig, LLC. Chase and  
8                   SFR are currently preparing written discovery to be served on each other. Chase is  
9                   also preparing written discovery to be served on Casa Palermo.

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

11                   SFR has noticed Chase's deposition for January 10, 2018, but Chase's Rule  
12                   30(b)(6) designee is unavailable on this date because the designee will be recovering  
13                   from a significant surgery she underwent in December. It is not known at this point  
14                   when her doctor will clear her to fly again, and she may be unable to fly until the end  
15                   of January or beginning of February 2018. The parties have met and conferred about  
16                   rescheduling Chase's deposition in this and other similar lawsuits to the week of  
17                   March 19, 2017. Although it is anticipated that Chase's designated witness should  
18                   be able to fly by February 2018, the parties are unable to schedule her deposition in  
19                   February as the witness will be testifying in numerous other lawsuits that month  
20                   (the rescheduling of which was also necessitated by her surgery.)

21                   This is the parties' first request to extend the discovery period in this case, and  
22                   they seek the extension so that Chase's designated witness may have an opportunity  
23                   to receive necessary medical treatment and recover from the same, which treatment  
24                   and recovery were not anticipated at the time the parties filed their first proposed  
25                   scheduling order. The parties have diligently engaged in discovery to date, met and

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27                   <sup>1</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.

1 conferred regarding the requested extension and scheduling of outstanding discovery  
2 items, and seek this extension in good faith.

3 **D. Proposed Discovery Deadlines**

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

6 <b>Event</b>	7 <b>Current Deadline<sup>2</sup></b>	8 <b>New Deadline</b>
Close of Discovery	February 16, 2018	April 16, 2018
Dispositive Motions	March 19, 2018	May 21, 2018
Pre-Trial Order	April 18, 2018	June 21, 2018

11 *[Continued on the following page]*

12  
13 If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended  
14 until 30 days after decision on the dispositive motions or further court order.

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<sup>2</sup> See Scheduling Order, ECF No. 29.

1        This extension is not requested for purposes of delay and is reasonable and  
2 necessary given the good cause set forth above.

3        **IT IS SO STIPULATED.**

4        Dated: January 5, 2018

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45        *Attorneys for Faranak Panahbaragh*

46        **ORDER**

47        **IT IS SO ORDERED:**



48        **UNITED STATES MAGISTRATE JUDGE**

49        DATED: 1-5-2018