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

14 JPMORGAN CHASE BANK, N.A.

15 Plaintiff,

16 vs.

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

20 Defendants.

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

21
22 **STIPULATION AND ORDER TO
EXTEND SCHEDULING ORDER
DEADLINES BY 60 DAYS**

(First Request)

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

24 Counter/Cross-Claimant,

25 vs.

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

27 Counter/Cross-Defendants.
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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, 2018.¹ 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

26 _____
27 ¹ 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.

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Event	Current Deadline ²	New Deadline
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

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11 *[Continued on the following page]*

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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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² See Scheduling Order, ECF No. 29.
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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

5 KIM GILBERT EBRON

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21 *Attorneys for Casa Palermo 20N
22 Homeowners' Association*

Attorneys for Faranak Panahbarhagh

23 **ORDER**

24 **IT IS SO ORDERED:**

25 
26 UNITED STATES MAGISTRATE JUDGE

27 DATED: 1-5-2018