

KUNG & BROWN
 214 South Maryland Parkway
 Las Vegas, Nevada 89101
 Tel: (702) 382-0883 / Fax: (702) 382-2720

1 A.J. Kung, Esq.
 Nevada Bar No. 7052
 2 Georlen K. Spangler, Esq.
 Nevada Bar No. 3818
 3 **KUNG & BROWN**
 214 South Maryland Parkway
 4 Las Vegas, Nevada 89101
 (702) 382-0883 Telephone
 5 (702) 382-2720 Facsimile
 E-Mail: ajkung@ajkunglaw.com
 6 gspangler@ajkunglaw.com
 Attorneys for Defendant
 7 *Daly Management Corporation*

8 **UNITED STATES DISTRICT COURT**
 9 **DISTRICT OF NEVADA**

10 * * *

11 NATIONSTAR MORTGAGE LLC and
 12 FEDERAL HOME LOAN MORTGAGE
 CORPORATION, a government sponsored
 13 enterprise,

CASE NO.: 2:17-cv-00474-JCM-NJK

14 Plaintiffs,

15 vs.

**STIPULATION TO EXTEND
 DISCOVERY WITH RESPECT TO
 DEFENDANT DALY
 MANAGEMENT CORPORATION
 ONLY**

(First Request)

16 NEWPORT COVE CONDOMINIUM UNIT
 17 OWNERS' ASSOCIATION, INC.; RBBE
 REAL ESTATE INVESTMENTS, LLC;
 18 DALY MANAGEMENT CORPORATION;
 and HAMPTON & HAMPTON
 19 COLLECTIONS LLC,

20 Defendants.
 21

22 IT IS HEREBY STIPULATED AND AGREED, by and between the parties' counsel of
 23 record and subject to the approval of the Court, that discovery in this case be extended with
 24 respect to Daly Management Corporation only from December 12, 2017 until January 30, 2017.¹

25 Thus, this request is timely under Local Rule 26-4 and the Scheduling Order (ECF No. 14).

26 Pursuant to Local Rule 26-4, the parties, through their counsel, state the following:
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28 ¹¹ Plaintiffs have a Motion to Stay Discovery pending. See, ECF 49 and ECF 48.

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(a) Discovery completed

The parties have exchanged the following sets of written discovery:

1. Plaintiffs to Defendant Daly Property Management— responses received October 19, 2017
 - a. Interrogatories
 - b. Requests for Production
 - c. Requests for Admission
2. Plaintiffs to Defendant Newport Cove — responses received October 3, 2017
 - a. Interrogatories
 - b. Requests for Production
 - c. Requests for Admission
3. Plaintiffs to Defendant Hampton & Hampton
 - a. Interrogatories
 - b. Requests for Production
 - c. Requests for Admission

The parties have completed the following depositions or the depositions will be completed prior to the current discovery cutoff:

1. Rule 30(b)(6) deposition of Newport Cove – completed
2. Rule 30(b)(6) deposition of Hampton & Hampton – set for December 8, 2017

(b) Discovery that remains to be completed

The following discovery remains to be completed:

1. Rule 30(b)(6) deposition of Daly Management Corporation;
2. Plaintiff may propound an additional 10 interrogatories, 10 requests for admission and 10 requests for production of documents to Daly Management in lieu of taking the Rule 30(b)(6) deposition of Daly Management.

(c) Reasons the remaining discovery was not completed within the time limits set by the discovery plan

Plaintiff noticed the Rule 30(b)(6) deposition for Daly Management Corporation to take place on November 15, 2017 at 2:00 p.m., however, when Plaintiff was advised that the Rule 30(b)(6) witness for Daly was elderly (in his mid-80's) and that he resided in California,

1 Plaintiff agreed to reschedule the deposition to a mutually agreeable time and place in
2 California.

3 The deposition was subsequently re-noticed for December 4, 2017 at 11:00 a.m., to be
4 conducted by teleconference, with the witness to be in California. However, as mentioned
5 above, the witness is elderly. He also has prostate cancer and is not feeling well. The parties
6 want to allow him time to feel better, and to avoid the holidays; therefore, they have agreed to
7 reschedule his deposition, subject to the Court's approval, for mid-January 2018.

8 **(d) Proposed schedule for completing all remaining discovery.**

9 The parties state this request is made for no improper purpose or delay. The new
10 proposed deadlines would be as follows:

11 Discovery Cutoff

12 The discovery cutoff deadline will be extended from December 12, 2017 to **January 30,**
13 **2018** with respect to Daly Management Corporation **only** for the purpose of allowing the
14 Plaintiff to conduct the Rule 30(b)(6) deposition, or in lieu thereof, to propound 10
15 interrogatories, 10 requests for production of documents, and 10 requests for admission.

16 Dispositive Motions

17 The last day for filing dispositive motions in this case shall be extended from January
18 11, 2017 to **February 12, 2018**

19 Joint Pretrial Order

20 The deadline to file the Joint Pretrial Order in this case shall be extended from
21 February 9, 2018, to **March 12, 2018**. In the event dispositive motions are pending before the
22 Court on that date, the date for filing the Joint Pretrial Order shall be suspended until 30 days
23 after the date of the Court's decision on the last dispositive motion.

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25 [signatures follow next page]

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1 This is the parties' first request for an extension of the discovery deadline and is not made
2 to delay this matter. Based upon the foregoing, the parties believe there is good cause for the
3 requested extension.

4 DATED this 1st day of December, 2017.

5 KUNG & BROWN

6 /s/ Georlen K. Spangler
7 Georlen K. Spangler, Esq.
8 Kung & Brown
9 214 South Maryland Parkway
10 Las Vegas, NV 89101
11 *Attorneys Daly Management Corporation*

DATED this 1st day of December, 2017.

AKERMAN LLP

/s/ Thera A. Cooper
Thera A. Cooper, Esq.
Akerman LLP
1160 Town Center Drive, Suite 330
Las Vegas, NV 89144
*Attorney for Nationstar Mortgage LLC and
Federal Home Loan Mortgage Corporation*

12 DATED this 1st day of December, 2017.

13 LIPSON NEILSON COLE SELTZER &
14 GARIN

/s/ Eric Tran
Eric Tran, Esq.
Lipson Neilson Cole Seltzer & Garin
9900 Covington Cross Dr. Ste. 120
Las Vegas, NV 89144
*Attorney for Newport Cove Condominium Unit
Owners' Association, Inc.*

DATED this 1st day of December, 2017.

/s/ Brandon Wood
Brandon Wood, Esq.
6224 West Desert Inn Rd.
Las Vegas, NV 89146
*Attorney for Hampton & Hampton Collections
LLC*

21 **IT IS SO ORDERED.**

22 
23 UNITED STATES MAGISTRATE JUDGE

24 Dated: December 4, 2017