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 as Trustee for GSAA 2006-1 and SunTrust Mortgage, Inc.
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 10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 U.S. BANK, NATIONAL ASSOCIATION,) CASE NO.: 2:17 cv-01319-JCM-GWF
 as Trustee for GSAA2006-1, an Ohio)
 13 Company; SUNTRUST MORTGAGE, INC.,)
 a Virginia Corporation)
 14)

15 Plaintiffs,)

16 v.)

STIPULATION AND ORDER TO EXTEND
DISCOVERY AND TO AMEND
SCHEDULING ORDER [ECF NO. 30]
(FIRST REQUEST)

17 SFR INVESTMENT POOL 1, LLC, a Nevada)
 limited liability company; SAN MARINO)
 18 PROPERTY OWNERS ASSOCIATION, a)
 Nevada non-profit corporation)

19 Defendants.)
 20)

21 Pursuant to LR IA 6-1, LR 7-1, and LR 26-4, Plaintiffs U.S. Bank, National Association, as
 22 Trustee for GSAA 2006-1 and SunTrust Mortgage, Inc. (“Plaintiffs”) through undersigned counsel,
 23 the law firm of Dickinson Wright, PLLC, Defendant SFR Investments Pool 1, LLC (“SFR”) through
 24 undersigned counsel, the law firm of Kim Gilbert Ebron, and Defendant San Marino Property
 25 Owners Association (“San Marino”), the law firm Lipson Neilson Cole Seltzer & Garin PC hereby
 26 agree and stipulate to extend the case management deadlines as set forth below. This is the parties’
 27 first request to extend discovery deadlines.
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1 **A. BACKGROUND STATEMENT AND COMPLETED DISCOVERY:**

2 Plaintiffs filed their Complaint on May 10, 2017 in the United States District Court for the
3 District of Nevada. On September 12, 2017, the Court entered its initial scheduling order in this case.
4 (ECF No. 30.) Plaintiffs just recently retained new counsel in this matter and filed the Substitution of
5 Counsel on February 12, 2018. This is the first request for an extension of the discovery deadlines,
6 which is limited to a request for an additional sixty (60) days.

7 The following discovery has been completed:

8 Plaintiffs served initial disclosures on September 7, 2017.

9 Defendant SFR served initial disclosures on September 6, 2017.

10 Defendant San Marino served initial disclosures on September 26, 2017.

11 Defendant San Marino has served Plaintiffs with interrogatories, request for production and
12 request for admission (“San Marino Discovery Requests”) on November 7, 2017. Plaintiffs have
13 until February 16, 2018 to respond to the San Marino Discovery Requests.

14 Defendant/Counterclaimant SFR served US Bank with interrogatories, request for production
15 and request for admission (“SFR Discovery Requests”) on February 7, 2018.

16 Defendant/Counterclaimant SFR has noticed the Rule 30(b)(6) Depositions of Plaintiffs for
17 March 9, 2018. The parties will likely need additional time to schedule the depositions for a
18 mutually agreeable date.

19 **B. DESCRIPTION OF DISCOVERY TO BE COMPLETED:**

20 The parties agree that additional time is necessary for the parties to complete discovery in this
21 case. Plaintiffs’ has recently retained new counsel who will need additional time to review
22 documents and evaluate the case. Additionally, the parties anticipate that they will take party
23 depositions and additional written discovery. The parties anticipate being able to schedule and
24 complete party depositions within the next 90 days, as well as any additional fact witnesses as
25 deemed necessary based upon documents received in response to subpoena.

26 **C. PROPOSED SCHEDULE FOR COMPLETING ALL REMAINING**
27 **DISCOVERY:**

28 The parties agree that an additional 60 days is required to complete discovery, and that new

1 deadlines should begin to run from the existing deadlines:

2 1. **Close of Discovery:**

3 Current Deadline – March 12, 2018

4 Proposed Deadline – **May 11, 2018**

5 2. **Dispositive Motion Deadline:**

6 Current Deadline – April 11, 2018

7 Proposed Deadline – **June 8, 2018**

8 3. **Pretrial Order:**

9 Current Deadline – May 11, 2018

10 Proposed Deadline – **July 6, 2018**

11 In the event that dispositive motions are filed, the date for filing the Joint Pretrial Order shall be
12 suspended and should be filed thirty (30) days after the decision on the dispositive motions or until
13 further order of the Court.

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1 Good cause exists for this short extension as Plaintiffs' just retained new counsel who needs
2 additional time to evaluate the case and conduct any necessary discovery. This request is not brought
3 for the purpose of undue delay.

4 Dated February 14, 2018

Dated February 14, 2018

5 DICKINSON WRIGHT, PLLC

Kim Gilbert Ebron

6 By: /s/ Cynthia Alexander

By: /s/ Diana Ebron

7 Cynthia L. Alexander, Esq.

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16 Association, as Trustee for GSAA 2006-1

17 and SunTrust Mortgage, Inc.

18 Dated February 14, 2018

19 Lipson Neilson Cole Seltzer & Garin PC

20 By: /s/ Karen Kao

21 Karen Kao

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23 Las Vegas, NV 89144

24 702-382-1500

25 Attorneys for Defendant San Marino

26 Property Owners Association

27 **IT IS SO ORDERED:**

28 
UNITED STATES MAGISTRATE JUDGE

DATED: 2/15/2018

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