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

11 WELLS FARGO FINANCIAL NEVADA 2,
12 INC., a Nevada corporation,
13 Plaintiff,
14 vs.
15 EDDIE HADDAD, an individual; DESERT
INN MOBILE FAMILY ESTATES OWNERS
16 ASSOCIATION; a Nevada non-profit
corporation; VIAL FOTHERINGHAM LLP,
17 an Oregon limited-liability partnership;
18 Defendants.

Case No. 2:17-cv-01511-RFB-CWH

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES**

(FIRST REQUEST)

19
20 Plaintiff Wells Fargo Financial Nevada 2, Inc. (“Wells Fargo”) and Eddie Haddad
21 (“Haddad”), by and through their respective counsel (collectively the “Parties”), for good cause
22 shown, hereby stipulate and agree to extend the discovery cut-off deadline in this action by 30
23 days to allow the Parties to reschedule and conduct depositions due to the Parties’ scheduling
24 constraints. This request complies with Local Rule (“LR”) 6-1, 6-3, 7-1, and 26-4, and is based on
25 good cause because the litigation of this matter will be best served by the proposed extension.
26 This is the Parties’ first extension request.
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1 **I. GOOD CAUSE FOR EXTENSION TO COMPLETE DISCOVERY**

2 Pursuant to Federal Rule of Civil Procedure 6(b)(1) and Local Rule 6-1, there exists good
3 cause to grant this extension to respond for the following reasons:

4 1. On May 21, 2018, Wells Fargo served deposition notices on Haddad and non-party
5 the Desert Inn Mobile Family Estates Owners Association (the “HOA”) for depositions to occur
6 on June 6 and June 15, 2018, respectively.

7 2. Haddad’s counsel advised Wells Fargo’s counsel that Haddad was unavailable on
8 June 6, 2018, but has not yet provided alternative availability.

9 3. Additionally, on June 8, 2018, the HOA’s counsel advised Wells Fargo’s counsel
10 that the HOA’s Rule 30(b)(6) witness was unavailable for a deposition on June 15.

11 4. Wells Fargo’s counsel and the HOA’s counsel are working to rescheduled the
12 HOA’s Rule 30(b)(6) deposition to a mutually agreeable time.

13 5. Due to the parties’ and their counsels’ availability, the parties are unable to
14 conduct Haddad’s deposition or the HOA’s deposition before the current discovery deadline of
15 June 19, 2018.

16 6. Therefore, good cause exists to extend the discovery cut-off deadline by 30 days,
17 to July 19, 2018, for Wells Fargo to conduct Haddad’s and the HOA’s respective depositions.

18 **II. DISCOVERY COMPLETED TO DATE**

19 To date the Parties have completed the following discovery:

- 20
- 21 • Wells Fargo made its initial FRCP 26(a)(1) disclosure on May 7, 2017.
 - 22 • Haddad made his initial FRCP 26(a)(1) disclosure on January 22, 2018.
 - 23 • Wells Fargo made its initial expert disclosure on March 19, 2018.
 - 24 • Haddad served his first set of Interrogatories, Requests for Production of
25 Documents, and Requests for Admission on Wells Fargo on March 19, 2018.
 - 26 ○ Wells Fargo responded to Haddad’s requests on May 7, 2018.
 - 27 • Wells Fargo served its first set of Interrogatories, Requests for Production of
28 Documents, and Requests for Admission on Haddad on May 17, 2018.
 - Haddad’s responses are currently due June 19, 2018.

1 **V. CONCLUSION**

2 For the foregoing reasons, the Parties respectfully request that the Court grant their
3 request to continue the discovery deadlines detailed herein by thirty (30) days.

4 Dated: June 12, 2018

Dated: June 12, 2018

5 SNELL & WILMER L.L.P.

LAW OFFICES OF MICHAEL S. BOHN,
ESQ., LTD.

7 By: /s/ Michael Paretti

By: /s/ Michael F. Bohn

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*Attorneys for Plaintiff Wells Fargo
Financial Nevada 2, Inc.*

14 **ORDER**

15 IT IS ORDERED.

16 DATED this 13 day of June 2018.

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UNITED STATES MAGISTRATE JUDGE

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CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing **STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES (FIRST REQUEST)** by the method indicated:

- _____ U.S. Mail
- _____ U.S. Certified Mail
- _____ Facsimile Transmission
- _____ Overnight Mail
- _____ Federal Express
- _____ Hand Delivery
- X Electronic Filing

and addressed to the following:

Michael F. Bohn, Esq.
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2260 Corporate Circle, Suite 480
Henderson, NV 89074
Attorneys for Defendant Eddie Haddad

DATED June 12, 2018

/s/ Maricris Williams
An Employee of Snell & Wilmer L.L.P.

4829-1084-6313