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6
 7 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

8 EDYTA GRYGLAK, formerly known)
 as EDYTA A. FROMKIN,)
 9)
 Plaintiff,)
 10 vs.)
 11 HSBC BANK USA, N.A., as trustee for)
 WELLS FARGO HOME EQUITY ASSET-)
 12 BACKED CERTIFICATES, Series 2006-3, by)
 its Attorney-in-fact WELLS FARGO BANK,)
 13 N.A., WELLS FARGO BANK, N.A., and)
 WELLS FARGO ASSET SECURITIES)
 14 CORPORATION,)
 15 Defendants.)

Case No.: 2:17-cv-01514-JCM-NJK

**STIPULATION AND ORDER
 EXTENDING PLAINTIFF’S DUE
 DATE TO RESPOND TO MOTION
 TO DISMISS**

FIRST REQUEST

Motion Filed August 14, 2017

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 17 Plaintiff Edyta Gryglak and Defendants HSBC Bank USA, N.A., as trustee for Wells
 18 Fargo Home Equity Asset-Backed Certificates, Series 2006-3, by its Attorney-in-fact Wells
 19 Fargo Bank, N.A., Wells Fargo Bank, N.A. and Wells Fargo Asset Securities Corporation
 20 (collectively, “Wells Fargo”) agree as follows:

21 WHEREAS on August 14, 2017, Wells Fargo filed a motion to dismiss the second, third,
 22 fourth, and fifth causes of action of the Complaint (Doc. No. 10) (the “Motion”);

23 WHEREAS the due date for plaintiff Edyta Gryglak to respond to the Motion was
 24 Monday August 28, 2017;

25 WHEREAS this is Ms. Gryglak’s first request for an extension of time, which is
 26 necessary due to the vacation and work schedules of her counsel;

27 WHEREAS Wells Fargo consents to this extension, which is not intended to cause any
 28 delay or prejudice to any party;

1 WHEREAS Ms. Gryglak is filing this stipulation and proposed order one day late, on
2 August 29, 2017 rather than August 28, 2017, due to excusable neglect on the part of her
3 counsel;¹

4 IT IS HEREBY STIPULATED AS FOLLOWS:

5 1. The due date for Ms. Gryglak's response to the Motion is extended by two weeks,
6 from August 28, 2017 to September 11, 2017.

7 Dated this 29th day of August 2017.

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9 AVRAMSKI LAW, PC
Counsel for Plaintiff

SNELL & WILMER L.L.P.
Counsel for Defendants

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11 */s/ Boris Avramski*

/s/ Blakeley E. Griffith

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17 **IT IS SO ORDERED:**

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19 
20 _____
UNITED STATES DISTRICT JUDGE

21 DATED: August 30, 2017
22 _____
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26 _____

27 ¹ In particular, on August 28, 2017, Ms. Gryglak's lead counsel, Edward Griffith, had just
28 returned from a vacation and was traveling in Florida for a court hearing in another case; this
stipulation and proposed order was not prepared and filed until the following day due to a
misunderstanding between Mr. Griffith and his staff.