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 2 (admitted *pro hac vice*)
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 Attorneys for Plaintiff Edyta Gryglak

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

8 EDYTA GRYGLAK, formerly known as
 9 EDYTA A. FROMKIN,

10 Plaintiff,

11 vs.

12 HSBC BANK USA, N.A., as trustee for
 13 WELLS FARGO HOME EQUITY ASSET-
 14 BACKED CERTIFICATES, Series 2006-3,
 15 by its Attorney-in-fact WELLS FARGO
 16 BANK, N.A.; WELLS FARGO BANK,
 N.A.; and WELLS FARGO ASSET
 SECURITIES CORPORATION,

Defendants.

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

**STIPULATION AND ORDER
 TO EXTEND PLAINTIFF’S TIME
 TO RESPOND TO DEFENDANTS’
 MOTION TO REOPEN DISPOSITIVE
 MOTION DEADLINE**

(THIRD REQUEST)

17 Defendants HSBC Bank USA, N.A., as trustee for Wells Fargo Home Equity Asset-Backed
 18 Certificates, Series 2006-3, by its Attorney-in-fact Wells Fargo Bank, N.A., Wells Fargo Bank,
 19 N.A., and Wells Fargo Asset Securities Corporation (collectively, “Defendants” or “Wells Fargo”)
 20 and Plaintiff Edyta Gryglak (“Plaintiff” and together with Defendants, the “Parties”) hereby
 21 stipulate to extend by the current briefing schedule for Defendants’ Motion to Reopen Dispositive
 22 Motion Deadline [ECF 136] (the “Motion to Reopen”) to allow Plaintiff two additional weeks to
 23 prepare and file her response and to adjust the due date for Defendants’ reply to avoid defense
 24 counsel’s conflicts in other matters. If approved, this stipulation would extend the due date for
 25 Plaintiff’s opposition from March 31, 2021 to April 14, 2021, and the due date for Defendants’
 26 reply from April 14, 2021 to April 28, 2021.

27 WHEREAS Defendants filed their Motion to Reopen on February 24, 2021;

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WHEREAS the Court granted Plaintiff Edyta Gryglak’s two prior requests to extend the due date to file opposing papers by one week from March 10, 2021 to March 31, 2021, *see* Orders [ECF 138 and 140];

WHEREAS Ms. Gryglak’s lead counsel, Edward Griffith, needs an additional two weeks to prepare and file Plaintiff’s opposition due to his litigation schedule on other matters, moderate side effects he experienced after his second Moderna COVID-19 vaccination and to continue his analysis of certain potentially relevant information; and

WHEREAS Wells Fargo consents to this request;

THE PARTIES HEREBY STIPULATE:

1. Ms. Gryglak’s due date to file papers in opposition to Wells Fargo’s Motion to Reopen is extended by two weeks, from March 31, 2021 to April 14, 2021 and the due date for Wells Fargo’s reply papers is extended from April 14, 2021 to April 28, 2021.

Dated: March 31, 2021
SNELL & WILMER L.L.P.
/s/ Blakeley E. Griffith
By: _____
Blakeley E. Griffith (NV Bar No. 12386)
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, Nevada 89169
(702) 784-5200
(702) 784-5252 (fax)

Dated: March 31, 2021
THE GRIFFITH FIRM
/s/ Edward Griffith
By: _____
Edward Griffith (*pro hac vice*)
45 Broadway, Suite 2200
New York, New York 10006
(646) 645-3784 (mobile)
(212) 363-3790 (fax)

Attorneys for Defendants

Attorney for Plaintiff

ORDER

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2 **IT IS HEREBY ORDERED** that the due date for Plaintiff to file papers in opposition to
3 Defendants' Motion to Reopen Dispositive Motion Deadline is extended by two weeks, from
4 March 31, 2021 to April 14, 2021, and the due date for Defendants to file reply papers is extended
5 from April 14, 2021 to April 28, 2021.

6 **IT IS SO ORDERED.**

7 DATED April 2, 2021.

8 
9 U.S. DISTRICT COURT JUDGE

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CERTIFICATE OF SERVICE

I hereby certify that on March 31, 2021, I electronically filed the foregoing **STIPULATION** with the Clerk of Court for the U.S. District Court, District of Nevada by using the Court’s CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

DATED this 31st day of March 2021.

/s/ Edward Griffith

EDWARD GRIFFITH, ESQ