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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,

17 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**

**(FOURTH REQUEST)**

18 Defendants HSBC Bank USA, N.A., as trustee for Wells Fargo Home Equity Asset-Backed  
 19 Certificates, Series 2006-3, by its Attorney-in-fact Wells Fargo Bank, N.A., Wells Fargo Bank,  
 20 N.A., and Wells Fargo Asset Securities Corporation (collectively, “Defendants” or “Wells Fargo”)  
 21 and Plaintiff Edyta Gryglak (“Plaintiff” and together with Defendants, the “Parties”) hereby  
 22 stipulate to extend by the current briefing schedule for Defendants’ Motion to Reopen Dispositive  
 23 Motion Deadline [ECF 136] (the “Motion to Reopen”) to allow Plaintiff two additional weeks to  
 24 prepare and file her response and to adjust the due date for Defendants’ reply to avoid defense  
 25 counsel’s conflicts in other matters. If approved, this stipulation would extend the due date for  
 26 Plaintiff’s opposition from April 14, 2021 to April 28, 2021, and the due date for Defendants’ reply  
 from April 28, 2021 to May 12, 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 three prior requests, which collectively extended the due date to file opposing papers from March 10, 2021 to April 14, 2021, *see* Orders [ECF 138, 140, 142];

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 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 April 14, 2021 to April 28, 2021 and the due date for Wells Fargo’s reply papers is extended from April 28, 2021 to May 12, 2021.

Dated: April 14, 2021

Dated: April 14, 2021

SNELL & WILMER L.L.P.

THE GRIFFITH FIRM

*/s/ Blakeley E. Griffith*

*/s/ Edward Griffith*

By: \_\_\_\_\_  
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*Attorneys for Defendants*

*Attorney for Plaintiff*

**ORDER**

**IT IS HEREBY ORDERED** that the due date for Plaintiff to file papers in opposition to Defendants' Motion to Reopen Dispositive Motion Deadline is extended by two weeks, from April 14, 2021 to April 28, 2021, and the due date for Defendants to file reply papers is extended from April 28, 2021 to May 12, 2021.

**IT IS SO ORDERED.**

DATED April 16, 2021.

  
U.S. DISTRICT COURT JUDGE

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 14, 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 14<sup>th</sup> day of April 2021.

*/s/ Edward Griffith*

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EDWARD GRIFFITH, ESQ