

1 Edward Griffith
 (admitted *pro hac vice*)
 2 THE GRIFFITH FIRM
 45 Broadway, Suite 2200
 3 New York, New York 10006
 (212) 363-3784
 4 (646) 645-3784 (cell)
 eg@thegriffithfirm.com
 5 *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-
 BACKED CERTIFICATES, Series 2006-3,
 14 by its Attorney-in-fact WELLS FARGO
 BANK, N.A.; WELLS FARGO BANK,
 15 N.A.; and WELLS FARGO ASSET
 SECURITIES CORPORATION,

16 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**

(FIFTH REQUEST)

**NO FURTHER EXTENSIONS WILL
 BE GRANTED**

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 April 28, 2021 to May 12, 2021, and the due date for Defendants’ reply
 26 from May 12, 2021 to May 26, 2021.

27 WHEREAS Defendants filed their Motion to Reopen on February 24, 2021;
 28

1 WHEREAS the Court granted Plaintiff Edyta Gryglak’s four prior requests, which
2 collectively extended the due date to file opposing papers from March 10, 2021 to April 28, 2021,
3 *see* Orders [ECF 138, 140, 142, 144];

4 WHEREAS Ms. Gryglak’s lead counsel, Edward Griffith, needs an additional two weeks
5 to prepare and file Plaintiff’s opposition due to his litigation schedule on other matters and to
6 continue his analysis of certain potentially relevant information;

7 WHEREAS due to Mr. Griffith’s error, Ms. Gryglak inadvertently failed to file this
8 Stipulation and Proposed Order by April 28, 2021, the current due date for her response, she seeks
9 approval of this Stipulation and Order pursuant to Rule 6(b)(1)(B) of the Federal Rules of Civil
10 Procedure; and

11 WHEREAS Wells Fargo consents to this request;

12 **THE PARTIES HEREBY STIPULATE:**

13 1. Ms. Gryglak’s due date to file papers in opposition to Wells Fargo’s Motion to
14 Reopen is extended by two weeks, from April 28, 2021 to May 12, 2021 and the due date for Wells
15 Fargo’s reply papers is extended from May 12, 2021 to May 26, 2021.

16 Dated: April 30, 2021

Dated: April 30, 2021

17 SNELL & WILMER L.L.P.

THE GRIFFITH FIRM

18 */s/ Blakeley E. Griffith*

/s/ Edward Griffith

19 By: _____
20 Blakeley E. Griffith (NV Bar No. 12386)
21 3883 Howard Hughes Parkway, Suite 1100
22 Las Vegas, Nevada 89169
(702) 784-5200
(702) 784-5252 (fax)

By: _____
Edward Griffith (*pro hac vice*)
45 Broadway, Suite 2200
New York, New York 10006
(646) 645-3784 (mobile)
(212) 363-3790 (fax)

23 *Attorneys for Defendants*

Attorney for Plaintiff

24
25
26
27
28

ORDER

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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 28, 2021 to May 12, 2021, and the due date for Defendants to file reply papers is extended from May 12, 2021 to May 26, 2021.

IT IS SO ORDERED. No further extensions will be granted.

DATED May 3, 2021.


U.S. DISTRICT COURT JUDGE

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I hereby certify that on April 30, 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 30th day of April 2021.

/s/ Edward Griffith

EDWARD GRIFFITH, ESQ