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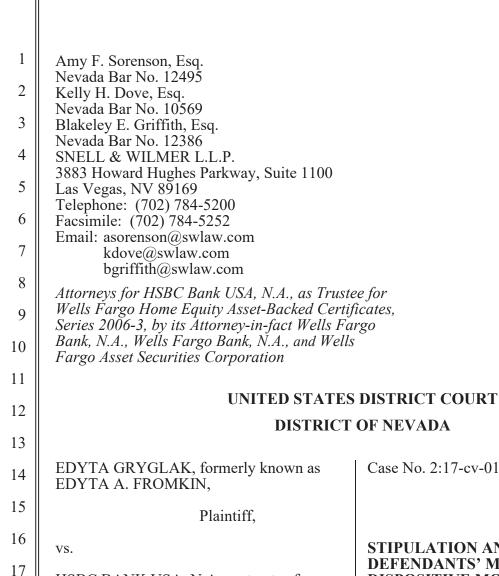
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Case No. 2:17-cv-01514-JCM-NJK

HSBC BANK USA, N.A., as trustee for WELLS FARGO HOME EQUITY ASSET-BACKED CERTIFICATES, Series

2006-3, by its Attorney-in-fact WELLS FARGO BANK, N.A.; WELLS FARGO BANK, N.A.; and WELLS FARGO ASSET SECURITIES CORPORATION.

Defendants.

STIPULATION AND ORDER GRANTING **DEFENDANTS' MOTION TO REOPEN** DISPOSITIVE MOTION DEADLINE [ECF No. 136]

Defendants HSBC Bank USA, N.A., as trustee for Wells Fargo Home Equity Asset-Backed Certificates, Series 2006-3, by its Attorney-in-fact Wells Fargo Bank, N.A.; Wells Fargo Bank, N.A.; and Wells Fargo Asset Securities Corporation (collectively, "Defendants" or "Wells Fargo") and Plaintiff Edyta Gryglak (together with Defendants, "the Parties") hereby stipulate to grant Wells Fargo's Motion to Reopen Dispositive Motion Deadline [ECF No. 136] to permit Wells Fargo to file its proposed renewed motion for summary judgment [ECF No. 136-1] and for

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Ms.	Gryglak	to	file	an	optional	summary-judgment	motion	regarding	her	theory	of	contract
damages, with the following background and for the following reasons:												

- 1. Wells Fargo filed its Motion to Reopen Dispositive Motion Deadline ("the Motion") on February 24, 2021. ECF No. 136.
- 2. The Motion seeks to reopen the dispositive motion deadline in this case to permit Wells Fargo to file a motion for summary judgment that addresses Ms. Gryglak's theory of damages for her contract claim, which Wells Fargo asserts was first raised after summary judgment. Wells Fargo's renewed summary judgment concerns only this sole remaining claim.
- 3. Wells Fargo appended its proposed renewed summary judgment motion to the Motion. ECF No. 136-1.
- 4. After several stipulations and an unopposed motion to extend time, Ms. Gryglak's deadline to oppose the Motion was extended until May 19, 2021, with no further extensions permitted. ECF No. 148.
- 5. Ms. Gryglak agrees that the Court should address the issues regarding contract damages raised in Wells Fargo's proposed renewed summary judgment motion and thus also agrees that the dispositive motion deadline should be reopened to permit Wells Fargo to file that motion.
- 6. Ms. Gryglak disagrees, however, with the merits of Wells Fargo's proposed renewed summary-judgment motion and intends to oppose it.
- 7. Ms. Gryglak also potentially desires to file her own summary judgment motion regarding her theory of contract damages.

Accordingly, the Parties here **STIPULATE** as follows:

- 1. Wells Fargo's Motion to Reopen Dispositive Motion Deadline (ECF No. 136) should be GRANTED.
- 2. The dispositive motion deadline in this action should be reopened for the limited purpose of permitting Wells Fargo to file its proposed renewed summary judgment motion (ECF No. 136-1) and permitting Ms. Gryglak to file an optional summary judgment motion addressing her theory of contract damages within the time limits described below.

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Attorneys for Defendants

3.	Wells Fargo may file its renewed	summary-judgment motion within 7 days of this							
Court granting the instant stipulation.									
4.	Ms. Gryglak shall have 30 days from the date that Wells Fargo files its renewed								
summary judgment motion to (1) file an opposition to that motion and (2) file her own optional									
summary judgment motion regarding her theory of contract damages, only.									
Dated: Ma	y 19, 2021	Dated: May 19, 2021							
	WILMER L.L.P.	The GRIFFITH FIRM							
Amy F. Šor Kelly H. D Blakeley E	H. Dove renson, Esq. (NV. Bar #. 12495) ove, Esq. (NV Bar # 10569) . Griffith, Esq. (NV Bar # 12386)	/s/ Edward Griffith Edward Griffith (pro hac vice) 45 Broadway, Suite 2200 New York New York 10006							

[Continued on Next Page]

Telephone: (646) 645-3784

Facsimile: (212) 363-3790

Attorney for Plaintiff

Snell & Wilmer

LLP.

LAW OFFICES
3883 Howard Hughes Parkway, Suite 1100

ORDER

Good cause appearing, IT IS HEREBY ORDERED that the Parties' stipulation is GRANTED.

IT IS FURTHER ORDERED that Wells Fargo's Motion to Reopen Dispositive Motion Deadline (ECF No. 136) is **GRANTED**.

IT IS FURTHER ORDERED that the dispositive motion deadline in this action is reopened for the limited purpose of permitting Wells Fargo to file its proposed renewed summary judgment motion (ECF No. 136-1) and permitting Ms. Gryglak to file an optional summary judgment motion addressing her theory of contract damages within the time limits set out below.

IT IS FURTHER ORDERED that Wells Fargo shall file its renewed summary judgment motion within 7 days of the date of this Order.

IT IS FURTHER ORDERED that Ms. Gryglak shall have 30 days from the date that Wells Fargo files its renewed summary judgment motion to (1) file an opposition to that motion and (2) file her own optional summary judgment motion regarding her theory of contract damages, only.

IT IS SO ORDERED.

DATED: May 24, 2021

U.S. DISTRICT COURT JUDGE

4834-2273-8410

CERTIFICATE OF SERVICE

I hereby certify that on February 24, 2021, I electronically filed the foregoing STIPULATION AND ORDER GRANTING DEFENDANTS' MOTION TO REOPEN DISPOSITIVE MOTION DEADLINE [ECF No. 136] 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 19th day of May 2021.

/s/ Kelly H. Dove
An Employee of Snell & Wilmer L.L.P.