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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

EDYTA GRYGLAK, formerly known as
EDYTA A. FROMKIN,

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

Plaintiff,

VS.

**STIPULATION AND ORDER TO
EXTEND BRIEFING SCHEDULE
ON DEFENDANTS' RENEWED
MOTION FOR SUMMARY JUDGMENT**

(FIRST REQUEST)

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.

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 (“Plaintiff” and together with Defendants, the “Parties”) hereby stipulate to extend by one week the time for Plaintiff to respond to for Defendants’ Renewed Motion for Summary Judgment [ECF 151] (the “Renewed Summary Judgment Motion”) from June 28, 2021 to July 6, 2021, and to set a briefing schedule for the Renewed Summary Judgment Motion and Ms. Gryglak’s intended motion for summary judgment.

WHEREAS on May 28, 2021, Wells Fargo filed the Renewed Summary Judgment Motion pursuant to the May 24, 2021 Stipulation and Order [ECF 150], which granted Wells Fargo's Motion to Reopen the Dispositive Motion Deadline;

1 WHEREAS the May 24, 2021 Stipulation and Order provided that “Ms. Gryglak shall have
 2 30 days from the date that Wells Fargo files its renewed summary judgment motion to (1) file an
 3 opposition to that motion and (2) file her own optional summary judgment motion regarding her
 4 theory of contract damages, only” (the “Gryglak Summary Judgment Motion”);

5 WHEREAS Ms. Gryglak has decided to file the Gryglak Summary Judgment Motion and
 6 requires an additional week to complete that motion and her papers in opposition to Wells Fargo’s
 7 Renewed Summary Judgment Motion;

8 WHEREAS Wells Fargo requires 30 days to file papers in opposition to the Gryglak
 9 Summary Judgment Motion and reply papers in further support of its Renewed Summary Judgment
 10 Motion; and

11 WHEREAS Wells Fargo and Ms. Gryglak believe that a unified briefing scheduling for
 12 both summary judgment motions is appropriate;

13 **THE PARTIES HEREBY STIPULATE:**

14 1. Ms. Gryglak’s due date to file the Gryglak Summary Judgment Motion and her
 15 papers in opposition to Wells Fargo’s Renewed Summary Judgment Motion is extended by one
 16 week, from June 28, 2021 to July 6, 2021.

17 2. The remainder of the briefing schedule for Wells Fargo’s Renewed Summary
 18 Judgment Motion and the Gryglak Summary Judgment Motion shall be:

- 19 (i) On August 6, 2021, Wells Fargo shall file papers in opposition to the
 20 Gryglak Summary Judgment Motion and reply papers in further
 21 support of its Renewed Summary Judgment Motion;
- 22 (ii) On August 20, 2021, Ms. Gryglak shall file reply papers in further
 23 support of the Gryglak Summary Judgment Motion.

24 Dated: June 28, 2021

25 SNELL & WILMER L.L.P.

26 By: /s/ Blakeley E. Griffith
 27 Blakeley E. Griffith (NV Bar No. 12386)
 28 3883 Howard Hughes Parkway, Suite 1100
 Las Vegas, Nevada 89169
 (702) 784-5200

29 Attorneys for Defendants

30 Dated: June 28, 2021

31 THE GRIFFITH FIRM

32 By: /s/ Edward Griffith
 33 Edward Griffith (*pro hac vice*)
 34 45 Broadway, Suite 2200
 New York, New York 10006
 (646) 645-3784 (mobile)

35 Attorney for Plaintiff

ORDER

IT IS HEREBY ORDERED that the due date for Ms. Gryglak to file her summary judgment motion regarding her theory of contract damages, only (the “Gryglak Summary Judgment Motion”) and her papers in opposition to Wells Fargo’s Renewed Motion for Summary Judgment is extended by one week, from June 28, 2021 to July 6, 2021.

IT IS HEREBY FURTHER ORDERED that the remainder of the briefing schedule for Wells Fargo's Renewed Motion for Summary Judgment and the Gryglak Summary Judgment Motion shall be:

- (i) On August 6, 2021, Wells Fargo shall file papers in opposition to the Gryglak Summary Judgment Motion and reply papers in further support of its Renewed Summary Judgment Motion;
- (ii) On August 20, 2021, Ms. Gryglak shall file reply papers in further support of the Gryglak Summary Judgment Motion.

IT IS SO ORDERED.

DATED July 1, 2021.

James C. Mahan
U.S. DISTRICT COURT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on June 28, 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 28th day of June 2021.

/s/ Edward Griffith

EDWARD GRIFFITH, ESQ