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*Attorneys for 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*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

EDYTA GRYGLAK, formerly known as  
EDYTA A. FROMKIN,

Plaintiff,

vs.

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.

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

**STIPULATION AND ORDER TO  
EXTEND BRIEFING SCHEDULE ON  
PLAINTIFF'S RULE 37(c) MOTION  
[ECF No. 160]**

**(FIRST REQUEST)**

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, "Wells Fargo"), and Plaintiff Edyta Gryglak ("Plaintiff" and together with Wells Fargo, the "Parties") hereby file the following stipulation to extend the briefing schedule for Plaintiff's "Rule 37(c) Motion to Confirm That Her Inadvertent Failure to File a Rule 26(A) Initial Disclosure Was Harmless" ("Rule 37(c) Motion")

(ECF No. 160), to synchronize it with the summary judgment briefing schedule that this Court has approved (ECF No. 155):

1. On May 28, 2021, Wells Fargo filed its Renewed Summary Judgment Motion (ECF No. 151), pursuant to a May 24, 2021 stipulation and order (ECF 150).

2. Pursuant to the July 6, 2021 stipulation granted by this Court, an extended, unified briefing schedule was created for both the Renewed Summary Judgment Motion and Plaintiff's own summary judgment motion on the issue of damages (the "Gryglak Summary Judgment Motion") (ECF No. 154):

a. **July 8, 2021:** the deadline for Plaintiff to file the Gryglak Summary Judgment Motion and her response to Wells Fargo's Renewed Summary Judgment Motion

b. **August 9, 2021:** the deadline for Wells Fargo's response to the Gryglak Summary Judgment Motion and its reply in further support of its Renewed Summary Judgment Motion

c. **August 23, 2021:** the deadline for Plaintiff's reply in further support of the Gryglak Summary Judgment Motion

3. Plaintiff timely filed her response to Wells Fargo's Renewed Summary Judgment Motion (ECF No. 156) and the Gryglak Summary Judgment Motion (ECF No. 159).

4. Along with these briefs, Plaintiff contemporaneously filed the Rule 37(c) Motion (ECF No. 160), which exclusively addresses issues raised in Wells Fargo's Renewed Summary Judgment Motion and the Gryglak Summary Judgment Motion.

5. A response to the Rule 37(c) Motion is currently due on July 23, 2021.

6. The Parties therefore agree that it would be efficient to synchronize the briefing schedule for the Rule 37(c) Motion with the schedule for the summary judgment motions.

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7. The Parties THEREFORE STIPULATE that the deadline for Wells Fargo's response to the Rule 37(c) Motion (ECF No. 160) is extended to August 9, 2021, and the deadline for Plaintiff's reply in support of that motion is extended to August 23, 2021.

Dated: July 15, 2021	Dated: July 15, 2021
SNELL & WILMER L.L.P.	THE GRIFFITH FIRM
By: <u>/s/ Kelly H. Dove</u> Amy F. Sorenson, Esq. Kelly H. Dove, Esq. Blakeley E. Griffith, Esq.	By: <u>/s/ Edward Griffith</u> Edward Griffith ( <i>pro hac vice</i> ) 45 Broadway, Suite 2200 New York, New York 10006 (646) 645-3784 (mobile)
<i>Attorneys for Defendants</i>	<i>Attorney for Plaintiff</i>

### ORDER

Good cause appearing, **IT IS HEREBY ORDERED** that the deadline for Wells Fargo's response to the Rule 37(c) Motion (ECF No. 160) is extended to August 9, 2021, and the deadline for Plaintiff's reply in support of that motion is extended to August 23, 2021.

**IT IS SO ORDERED.**

DATED July 16, 2021

  
U.S. DISTRICT COURT JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that on July 15, 2021, I electronically filed the foregoing **STIPULATION AND ORDER TO EXTEND BRIEFING SCHEDULE ON PLAINTIFF'S RULE 37(c) MOTION [ECF No. 160]** 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 15th day of July 2021.

/s/ Maricris Williams  
An Employee of Snell & Wilmer L.L.P.

Snell & Wilmer

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