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16 Wells Fargo Home Equity Asset-Backed Certificates,
17 Series 2006-3, by its Attorney-in-fact Wells Fargo
18 Bank, N.A., Wells Fargo Bank, N.A., and Wells
19 Fargo Asset Securities Corporation*

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21 **UNITED STATES DISTRICT COURT**
22 **DISTRICT OF NEVADA**

23 EDYTA GRYGLAK, formerly known as
24 EDYTA A. FROMKIN,

25 Plaintiff,

26 vs.

27 HSBC BANK USA, N.A., as trustee for
28 WELL'S FARGO HOME EQUITY
ASSET-BACKED CERTIFICATES, Series
2006-3, by its Attorney-in-fact WELL'S
FARGO BANK, N.A.; WELL'S FARGO
BANK, N.A.; and WELL'S FARGO
ASSET SECURITIES CORPORATION,

29 Defendants.

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

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

36 **(FIRST REQUEST)**

37 Defendants HSBC Bank USA, N.A., as trustee for Wells Fargo Home Equity Asset-Backed
38 Certificates, Series 2006-3, by its Attorney-in-fact Wells Fargo Bank, N.A.; Wells Fargo Bank,
39 N.A.; and Wells Fargo Asset Securities Corporation (collectively, "Wells Fargo"), and Plaintiff
40 Edyta Gryglak ("Plaintiff" and together with Wells Fargo, the "Parties") hereby file the following
41 stipulation to extend the briefing schedule for Plaintiff's "Rule 37(c) Motion to Confirm That Her
42 Inadvertent Failure to File a Rule 26(A) Initial Disclosure Was Harmless" ("Rule 37(c) Motion")

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

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

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

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

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

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

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

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

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

22 6. The Parties therefore agree that it would be efficient to synchronize the briefing
 23 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 SNELL & WILMER L.L.P. By: <u>/s/ Kelly H. Dove</u> Amy F. Sorenson, Esq. Kelly H. Dove, Esq. Blakeley E. Griffith, Esq. <i>Attorneys for Defendants</i>	Dated: July 15, 2021 THE GRIFFITH FIRM 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>Attorney for Plaintiff</i>
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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

James C. Mahan
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.

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