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 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-
 14 BACKED CERTIFICATES, Series 2006-3,
 15 by its Attorney-in-fact WELLS FARGO
 BANK, N.A.; WELLS FARGO BANK,
 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 FILE REPLY IN FURTHER
 SUPPORT OF MOTION FOR PARTIAL
 SUMMARY JUDGMENT/RESPONSE
 TO MOTION TO STRIKE AND SET
 DEADLINE FOR WELLS FARGO TO
 FILE REPLY IN SUPPORT OF
 MOTION TO STRIKE**

(FIRST REQUEST)

17
 18 Defendants HSBC Bank USA, N.A., as trustee for Wells Fargo Home Equity Asset-Backed
 19 Certificates, Series 2006-3, by its Attorney-in-fact Wells Fargo Bank, N.A., Wells Fargo Bank,
 20 N.A., and Wells Fargo Asset Securities Corporation (collectively, "Defendants" or "Wells Fargo")
 21 and Plaintiff Edyta Gryglak ("Plaintiff" and together with Defendants, the "Parties") hereby
 22 stipulate to extend by one week, from August 23, 2021 to August 30, 2021 the deadline for Plaintiff
 23 to file her reply papers in further support of her Motion for Partial Summary Judgment [ECF 159]
 24 (the "Gryglak SJ Motion") and her Motion under Rule 37(c) to Confirm that Plaintiff's Inadvertent
 25 Failure to Serve a Rule 26(a) Initial disclosure was Harmless [ECF 160] (the "Motion to Confirm"),
 26 as well as her Response to Wells Fargo's Motion to Strike the Declaration of Phil Neuman [ECF
 27 167] (the "Motion to Strike"); and (ii) to set Wells Fargo's deadline to file reply papers in further
 28 support of its Motion to Strike to Monday, September 20, 2021.

1 WHEREAS on July 9, 2021, Plaintiff filed the Gryglak SJ Motion and her Motion to
2 Confirm;

3 WHEREAS on August 9, 2021, Wells Fargo filed its Responses to the Gryglak SJ Motion
4 and the Motion to Confirm, and filed its Motion to Strike;

5 WHEREAS due to his summer vacation and litigation schedule, Ms. Gryglak’s lead
6 counsel, Edward Griffith, needs one additional week to prepare and file Ms. Gryglak’s reply papers
7 in further support of the Gryglak SJ Motion and the Motion to Confirm as well as her response to
8 Wells Fargo’s Motion to Strike;

9 WHEREAS due to Mr. Griffith’s error, Ms. Gryglak inadvertently failed to file this
10 Stipulation and Proposed Order by August 23, 2021, the current due date for her reply/response
11 papers, she seeks approval of this Stipulation and Order pursuant to Rule 6(b)(1)(B) of the Federal
12 Rules of Civil Procedure and Local Rule IA 6-1(a); and

13 WHEREAS Wells Fargo consents to this request and proposed briefing schedule;

14 **THE PARTIES HEREBY STIPULATE AND AGREE** as follows:

15 1. Ms. Gryglak’s due date to file reply papers in further support of the Gryglak SJ
16 Motion and the Motion to Confirm, as well as her response to Wells Fargo’s Motion to Strike, is
17 extended by one week, from August 23, 2021 to August 30, 2021.

18 2. The due date for Wells Fargo to file its reply papers in further support of its Motion
19 to Strike is Monday, September 20, 2021.

20 Dated: August 24, 2021
21 SNELL & WILMER L.L.P.
22 */s/ Blakeley E. Griffith*
23 By: _____
24 Blakeley E. Griffith (NV Bar No. 12386)
25 3883 Howard Hughes Parkway, Suite 1100
26 Las Vegas, Nevada 89169
(702) 784-5200
(702) 784-5252 (fax)

27 *Attorneys for Defendants*

Dated: August 24, 2021
THE GRIFFITH FIRM
/s/ Edward Griffith
By: _____
Edward Griffith (*pro hac vice*)
45 Broadway, Suite 2200
New York, New York 10006
(646) 645-3784 (mobile)
(212) 363-3790 (fax)

Attorney for Plaintiff

ORDER

1
2 **IT IS HEREBY ORDERED** that the due date for Plaintiff’s reply papers in further
3 support of her Motion for Partial Summary Judgment [ECF 159] and her Motion under Rule 37(c)
4 to Confirm that Plaintiff’s Inadvertent Failure to Serve a Rule 26(a) Initial disclosure was
5 Harmless [ECF 160], as well as her response to Wells Fargo’s Motion to Strike the Declaration of
6 Phil Neuman [ECF 167] (the “Motion to Strike”), is extended by one week, from August 23, 2021
7 to August 30, 2021.

8 **IT IS HEREBY FURTHER ORDERED** that the due date for Wells Fargo to file its
9 reply papers in further support of its Motion to Strike is September 20, 2021.

10 **IT IS SO ORDERED.**

11 DATED August 25, 2021.

12
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14 U.S. DISTRICT COURT JUDGE

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CERTIFICATE OF SERVICE

I hereby certify that on August 24, 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 24th day of August 2021.

/s/ Edward Griffith

EDWARD GRIFFITH, ESQ