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8 *Wells Fargo Home Equity Asset-Backed Certificates,*
9 *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**

12 EDYTA GRYGLAK, formerly known as
EDYTA A. FROMKIN,

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

13 Plaintiff,

14 || vs.

15 HSBC BANK USA, N.A., as trustee for
16 WELLS FARGO HOME EQUITY
17 ASSET-BACKED CERTIFICATES, Series
18 2006-3, by its Attorney-in-fact WELLS
FARGO BANK, N.A.; WELLS FARGO
BANK, N.A.; and WELLS FARGO
ASSET SECURITIES CORPORATION,

STIPULATION AND ORDER

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES**

(THIRD REQUEST)

19 Defendants.

21 Defendants HSBC BANK USA, N.A., as trustee for WELLS FARGO HOME EQUITY
22 ASSET-BACKED CERTIFICATES, Series 2006-3, by its Attorney-in-fact WELLS FARGO
23 BANK, N.A.; WELLS FARGO BANK, N.A. (“Wells Fargo”); AND WELLS FARGO ASSET
24 SECURITIES CORPORATION (collectively “Defendants”) and Plaintiff Edyta Gryglak
25 (“Plaintiff” and together with Defendants, the “Parties”) by and through their counsel, hereby
26 stipulate and request that this Court extend the remaining discovery deadlines in the above-
27 captioned case by sixty (60) days. The current close of discovery is May 14, 2018, and the
28 Parties seek an extension to July 13, 2018.

1 This is the Parties' Third Request to extend the discovery deadlines. In support of this
2 Stipulation, the Parties state as follows.

3 **A. REASONS WHY REMAINING DISCOVERY WAS NOT COMPLETED**

4 As previously noted to the Court, Defendants' counsel Blakeley E. Griffith, Esq., had
5 taken the lead in litigating this case on behalf of Defendants, but was on leave pursuant to the
6 Family Medical Leave Act ("FMLA") through March 25, 2018. Unfortunately, counsel that took
7 her place as lead, Jennifer L. McBee, Esq., had a health diagnosis in February that required her to
8 have multiple out-of-town doctor appointments and required surgery. This unexpected medical
9 issue caused the parties to request the second extension for discovery. Now, Ms. Griffith has
10 returned from FMLA leave and is getting back up to speed on this case while Ms. McBee is now
11 out on FMLA leave. Previously, the parties intended to respond to all written discovery by April
12 6, 2018 and have depositions take place in April. However, due to the Parties' schedules they
13 were unable to schedule the depositions in April and these have been scheduled for early May
14 instead. A significant reason for the delay in scheduling these depositions is Wells Fargo's
15 extensive witness schedule. In Nevada alone, Wells Fargo is currently providing witnesses for
16 hundreds of depositions. The Parties have worked together to schedule the depositions of Wells
17 Fargo for May 11, 2018 and Mrs. Gryglak for May 15, 2018.¹ However, in an abundance of
18 caution, the Parties wish to extend discovery for an additional sixty (60) days in case any third
19 party deposition is necessary after the depositions of Plaintiff and Wells Fargo. The Parties
20 acknowledge that it is not typical to have three extensions of discovery and do not seek such an
21 extension lightly. Unfortunately, due to the circumstances noted above it has been necessary in
22 this case.

23 The Parties have been working diligently to litigate this action, with a dispositive motion
24 having recently been ruled on and written discovery propounded by all Parties. Further, Plaintiff
25 recently filed a Motion for Reconsideration and Defendants' opposition is due on April 16, 2018.
26 Extending the close of discovery and dispositive motion deadlines will allow additional time for
27 counsel to take the depositions and schedule any further depositions if necessary.

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¹ This is one day after the present close of discovery.

1 The Parties do not seek an extension for any improper purpose, or for the purpose of
2 delay. Additionally, an extension of time will not prejudice the Parties, as all counsel explicitly
3 consents to the requested extension. Finally, the Parties are only requesting an extension of the
4 close of discovery, dispositive motions, and the joint pretrial order, and request that these deadlines
5 be extended, as detailed below.

6 **B. DISCOVERY COMPLETED TO DATE**

7 The following discovery has been completed:

8 1. Defendants responded to Plaintiff's written discovery on March 23, 2018.
9 2. Plaintiff will respond to Defendant's written discovery on April 20, 2018.
10 3. The Parties have scheduled depositions of the Plaintiff for May 15, 2018 and of
11 Wells Fargo for May 11, 2018.

12 **C. DISCOVERY THAT REMAINS TO BE COMPLETED**

13 The following discovery remains to be completed:

14 1. Plaintiff's deposition, which is scheduled for May 15, 2018 and Wells Fargo's
15 deposition which is scheduled for May 11, 2018.
16 2. Any third party depositions or depositions of other Defendants other than Wells
17 Fargo, which arise after the depositions of Wells Fargo and the Plaintiff.

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1 **D. PROPOSED SCHEDULE**

2 Accordingly, the Parties propose the following schedule:

3 Event	4 Current Deadline	5 Proposed New Deadline
Dispositive Motions	June 15, 2018	August 13, 2018
Close of Discovery	May 14, 2018	July 13, 2018
Joint Pretrial Order	July 16, 2018	September 12, 2018

6 Dated: April 12, 2018.

7 SNELL & WILMER L.L.P.

8 By: /s/ Blakeley E. Griffith
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15 Certificates, Series 2006-3, by its Attorney-in-fact
16 Wells Fargo Bank, N.A., Wells Fargo Bank, N.A.,
17 and Wells Fargo Asset Securities Corporation

6 Dated: April 12, 2018.

7 VEGAS WEST ATTORNEYS

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14 Attorney for Plaintiff

15 **ORDER**

16 IT IS SO ORDERED.

17 DATED: April 12, 2018

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20 UNITED STATES MAGISTRATE JUDGE