

1 VEGAS WEST ATTORNEYS  
 Boris Avramski, Esq.  
 2 Nevada Bar No. 11350  
 5594 South Fort Apache Road, Suite 120  
 3 Las Vegas, NV 89148  
 Phone: (702) 629-7553  
 4 Fax: (702) 629-2276  
 boris@vegaswestattorneys.com  
 5 Attorney for Plaintiff

6  
 7 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

8 EDYTA GRYGLAK, formerly known )  
 as EDYTA A. FROMKIN, )  
 9 )  
 Plaintiff, )  
 10 vs. )  
 11 HSBC BANK USA, N.A., as trustee for )  
 WELLS FARGO HOME EQUITY ASSET- )  
 12 BACKED CERTIFICATES, Series 2006-3, by )  
 its Attorney-in-fact WELLS FARGO BANK, )  
 13 N.A., WELLS FARGO BANK, N.A., and )  
 WELLS FARGO ASSET SECURITIES )  
 14 CORPORATION, )  
 15 Defendants. )

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

**STIPULATION AND ORDER  
 ALLOWING PLAINTIFF’S  
 DEPOSITION TO TAKE PLACE  
 AFTER DISCOVERY DEADLINE  
 AND EXTENDING DEADLINE  
 FOR DISPOSITIVE MOTIONS  
 AND JOINT PRE-TRIAL ORDER  
 (First Request)**

16  
 17 Plaintiff Edyta Gryglak and Defendants HSBC Bank USA, N.A., as trustee for Wells  
 18 Fargo Home Equity Asset-Backed Certificates, Series 2006-3, by its Attorney-in-fact Wells  
 19 Fargo Bank, N.A., Wells Fargo Bank, N.A. and Wells Fargo Asset Securities Corporation  
 20 (collectively, “Wells Fargo” and with the plaintiff, the “Parties”)) agree as set forth below to  
 21 take Plaintiff’s deposition after the close of discovery on August 17, 2018, to extend the deadline  
 22 for dispositive motions from August 13, 2018 to September 13, 2018, and to extend the deadline  
 23 for pre-trial orders from September 13, 2018 to October 16, 2018. This is the Parties’ first  
 24 request for an extension of time of the dispositive motions and joint pre-trial order.

25 WHEREAS the current discovery deadline is Friday, July 13, 2018;

26 WHEREAS the current deadlines to file dispositive motions and the joint pre-trial order  
 27 are August 13, 2018 and September 13, 2018, respectively;

28 WHEREAS plaintiff’s deposition has not yet taken place due to plaintiff’s prior

1 scheduling issues;

2 WHEREAS plaintiff's deposition is currently scheduled to take place on Thursday, July  
3 12, 2018;

4 WHEREAS plaintiff's lead counsel is no longer available due to an unexpected personal  
5 emergency involving a close friend with terminal brain cancer;

6 WHEREAS Wells Fargo has generously agreed to reschedule plaintiff's deposition for a  
7 subsequent date provided the Court permits the deposition to occur after the July 13, 2018  
8 discovery cut-off;

9 WHEREAS August 17, 2018 is the most convenient date for plaintiff's rescheduled  
10 deposition considering the schedules of Ms. Gryglak and counsel for the Parties;

11 Whereas, August 17, 2018, the date of the continued deposition, is after the deadline for  
12 dispositive motions, therefore the Parties request that the dispositive motion deadline be  
13 continued for thirty days (30) or until September 13, 2018.<sup>1</sup> In conjunction with this, the Parties  
14 request that the deadline for the pre-trial order be continued for thirty days (30) after that, or until  
15 October 16, 2018. This is the Parties' first request for an extension of these deadlines, and is  
16 requested due to the circumstances detailed above, and the Parties' schedules. It is made in good  
17 faith and is not intended to cause delay.

18 IT IS HEREBY STIPULATED AS FOLLOWS:

- 19 1. The deposition of plaintiff Edyta Gryglak is permitted to proceed on August 17,  
20 2018.
- 21 2. The deadlines to file dispositive motions and the joint pre-trial order are continued  
22 for thirty days, until Monday, September 13, 2018 and Monday, October 16, 2018, respectively.
- 23  
24  
25

---

26 <sup>1</sup> The Parties uploaded a prior stipulation continuing the deposition to August 17, 2018  
27 that did not address the dispositive motion deadline or other deadlines. [ECF No.37] The Court  
28 denied that stipulation without prejudice. [ECF No.38]. The Parties submit this Stipulation to  
remedy those defects and address the dispositive motion deadlines.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Dated this 11<sup>th</sup> day of July 2018.

VEGAS WEST ATTORNEYS  
Counsel for Plaintiff

SNELL & WILMER L.L.P.  
Counsel for Defendants

*/s/ Boris Avramski*

*/s/ Blakeley E. Griffith*

---

Boris Avramski, Esq.  
Nevada Bar No. 11350  
VEGAS WEST ATTORNEYS  
5594 South Fort Apache Road, Suite 120  
Las Vegas, NV 89148  
Phone: (702) 629-7553  
Fax: (702) 629-2276  
boris@vegastwestattorneys.com

---

Blakeley E. Griffith, Esq.  
Nevada Bar No. 12386  
SNELL & WILMER L.L.P.  
3883 Howard Hughes Parkway  
Las Vegas, NV 89169  
Phone: (702) 784-5200  
Fax: (702) 784-5252  
bgriffith@swlaw.com

**IT IS SO ORDERED:**

  
\_\_\_\_\_  
UNITED STATES MAGISTRATE JUDGE

DATED: July 12, 2018