

Edward Griffith
(admitted *pro hac vice*)
THE GRIFFITH FIRM
45 Broadway, Suite 2200
New York, New York 10006
(212) 363-3784
(646) 645-3784 (cell)
eg@thegriffithfirm.com
Attorneys for Plaintiff Edyta Gryglak

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

**THIRD STIPULATION AND ORDER
EXTENDING SUMMARY JUDGMENT
BRIEFING SCHEDULE**

(Third 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, “Defendants”) and Plaintiff Edyta Gryglak (“Plaintiff” and together with Defendants, the “Parties”) hereby stipulate to extend the briefing schedule on Defendants’ Motion for Summary Judgment [ECF 45] as follows:

- (i) the due date for Plaintiff’s opposition papers shall be extended by two weeks, from October 25, 2018, to November 8, 2018; and
- (ii) Defendants’ time to file reply papers be three weeks later, on November 29, 2018.

WHEREAS Defendants filed their Motion for Summary Judgment on September 13, 2018;

WHEREAS the Court previously granted the parties’ First Stipulation and Order, which extended Plaintiff’s due date to file opposition papers by two weeks, from October 4, 2018 to

1 October 18, 2018, and the parties' Second Stipulation and Order, which extended Plaintiff's due
2 date by one week, from October 18, 2018 to October 25, 2018, and extended Defendants' response
3 time from two weeks to three weeks;

4 WHEREAS the first and second extensions were necessary due to the hospitalization of
5 Plaintiff's counsel and his intense work schedule upon returning to work;

6 WHEREAS Plaintiff counsel's work scheduled has continued to prevent him from
7 completing Plaintiff's opposition papers, including a statutory deadline to file a Rule 52 motion to
8 alter or amend a bankruptcy court judgment on October 19, 2018, a court-ordered deadline to file
9 a motion for fees and costs on October 22, 2018, complex discovery deadlines on October 22, 2018
10 and October 23, 2018 in cases pending, respectively, in the Central District of California and the
11 District of Colorado, summary judgment opposition due on October 24, 2018 in a case in the
12 Eastern District of Michigan (for which an extension is being sought), an October 31, 2018 trial in
13 New York state court with pre-trial lists and motions due on October 26, 2018; and motion hearings
14 in a case in Florida state court on October 29 and November 1, 2018;

15 WHEREAS Plaintiff's counsel needs an additional two weeks to complete and file
16 Plaintiffs' opposition papers, which would extend the due date for opposition papers to November
17 8, 2018;

18 **THE PARTIES HEREBY STIPULATE:**

19 1. The briefing schedule on Defendants' motion for summary judgment is extended as
20 follows:

21 (i) Opposition papers are due on November 8, 2018;

22 (ii) Reply papers are due on November 29, 2018.

23 Dated: October 24, 2018

Dated: October 24, 2018

24 SNELL & WILMER L.L.P.

THE GRIFFITH FIRM

25 */s/ Blakeley E. Griffith*

/s/ Edward Griffith

26 By: Blakeley E. Griffith (NV Bar No. 12386)
27 3883 Howard Hughes Parkway, Suite 1100
28 Las Vegas, Nevada 89169
(702) 784-5200
Attorneys for Defendants

By: Edward Griffith (pro hac vice)
45 Broadway, Suite 2200
New York, New York 10006
(212) 363-3784
Attorney for Plaintiff

1 **ORDER**

2 **IT IS HEREBY ORDERED** that the briefing schedule on Defendants' motion for
3 summary judgment is extended as follows:
4

- 5 (i) Opposition papers are due on November 8, 2018;
6 (ii) Reply papers are due on November 29, 2018..

7 **IT IS SO ORDERED.**

8 DATED this 25th day of October 2018.

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10 U.S. DISTRICT COURT JUDGE
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CERTIFICATE OF SERVICE

I hereby certify that on October 24, 2018, I electronically filed the foregoing 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 October 2018.

/s/ Edward Griffith

EDWARD GRIFFITH, ESQ