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*Attorneys for 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*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

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

13 Plaintiff,

14 vs.

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

19 Defendants.

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

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO ANSWER
COMPLAINT**

(SECOND REQUEST)

20 Defendants HSBC BANK USA, N.A., as trustee for WELLS FARGO HOME EQUITY
21 ASSET-BACKED CERTIFICATES, Series 2006-3, by its Attorney-in-fact WELLS FARGO
22 BANK, N.A.; WELLS FARGO BANK, N.A.; AND WELLS FARGO ASSET SECURITIES
23 CORPORATION (“Defendants”) and Plaintiff Edyta Gryglak (“Plaintiff” and together with
24 Defendants, the “Parties”) hereby stipulate to extend the deadline for Defendants to answer or
25 otherwise respond to Plaintiff’s Complaint from July 31, 2017 to August 14, 2017.

26 WHEREAS, Plaintiff filed her Complaint against Defendants on May 28, 2017;

27 WHEREAS, Defendants were served with the Complaint on June 7, 2017, making their
28 response due on June 28, 2017;

1 WHEREAS, the Parties stipulated and agreed to extend the time to respond to the
2 Complaint from June 28, 2017 to July 31, 2017.

3 WHEREAS, the Parties now stipulate and agree to extend the time to respond to the
4 Complaint from July 31, 2017 to August 14, 2017.

5 WHEREAS, this is the second request for an extension of time to respond to the
6 Complaint and is not intended to cause any delay or prejudice to any party and the reason for the
7 extension is that attorneys for Defendants have been involved in preparing and participating in a
8 week-long trial from July 17 to July 21st and need more time to evaluate and prepare an
9 appropriate response to the Complaint;

10 WHEREAS, on or about May 25, 2017, Defendants commenced a non-judicial
11 foreclosure proceeding against Plaintiff (the "Foreclosure Proceeding") by recording Notice of
12 Default and Election to Sell Under Deed of Trust (the "Notice of Default"); and

13 WHEREAS, Plaintiff has no objection to extending Defendants' time to respond to the
14 Complaint if Defendants suspend any further action to prosecute the Foreclosure Proceeding or
15 Notice of Default;

16 **THE PARTIES HEREBY STIPULATE:**

17 1. The deadline for Defendants to answer or otherwise respond to Plaintiff's
18 Complaint from July 31, 2017 to August 14, 2017.

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2. During this extension, Defendants shall not take any further action to prosecute the Foreclosure Proceeding, including but not limited to, recording a notice of trustee's sale, until seven days after Defendants respond to the Complaint.

Dated: July 26, 2017.

Dated: July 26, 2017.

SNELL & WILMER L.L.P.

AVRAMSKI LAW, PC

By: /s/ Blakeley E. Griffith
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ORDER

IT IS HEREBY ORDERED that the deadline for 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 to file an Answer or otherwise respond to Plaintiffs' Complaint shall be **August 14, 2017**.

During the extension, Defendants shall not take any action to prosecute a Foreclosure Proceeding against Plaintiff's property identified in the Complaint, including, but not limited to, taking any action to record a notice of trustee's sale, until seven days after Defendants respond to the Complaint.

IT IS SO ORDERED.

**NO FURTHER EXTENSIONS
WILL BE GRANTED.**

DATED this 27th day of July 2017.


United States Magistrate Judge

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Respectfully submitted by:

SNELL & WILMER L.L.P.

/s/ Blakeley E. Griffith

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Attorneys for Defendant and Counter-Claimant

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