

1 JACOB D. BUNDICK, ESQ.
 Nevada Bar No. 9772
 2 MICHAEL HOGUE, ESQ.
 Nevada Bar No. 12400
 3 GREENBERG TRAUERIG, LLP
 3773 Howard Hughes Parkway, Suite 400 N
 4 Las Vegas, Nevada 89169
 Telephone: (702) 792-3773
 5 Facsimile: (702) 792-9002
 Email: bundickj@gtlaw.com
 6 bedkers@gtlaw.com

7 *Counsel for Defendant*
 8 *Specialized Loan Servicing, LLC*

9
 10 **UNITED STATES DISTRICT COURT**
 11 **DISTRICT OF NEVADA**

12 TROY A. GARCIA,
 13 Plaintiff,

Case No.: 2:17-cv-01721-RFB-VCF

14 v.

STIPULATION FOR EXTENSION OF TIME

15 SPECIALIZED LOAN SERVICING LLC;
 16 AMERICAN HONDA FINANCE CORP.;
 TOYOTA FINANCIAL SERVICES; WELLS
 17 FARGO CARD SERVICES; EQUIFAX
 INFORMATION SERVICES, LLC,

SECOND REQUEST

18 Defendants.

19 Pursuant to LR 6-1 and LR 26-4, Plaintiff Troy A. Garcia (“Plaintiff”), and Defendant
 20 Specialized Loan Servicing, LLC (“SLS”), by and through their respective counsel of record,
 21 hereby stipulate and request that this Court extend the dispositive motion deadline and deadline to
 22 file pre-trial order, by thirty (30) days. At this time, the parties are not seeking an extension of
 23 any other discovery deadlines but reserve the right to request in the future. In support of this
 24 Stipulation and Request, the parties state as follows:

25 **A. DISCOVERY COMPLETED TO DATE**

26 Presently, the active parties to this case are Plaintiff and Specialized Loan Servicing, LLC
 27 (“SLS”), and as such, the recitation of discovery shall be with respect to Plaintiff and SLS.
 28

Greenberg Traurig, LLP
 Suite 400 North, 3773 Howard Hughes Parkway
 Las Vegas, Nevada 89169
 (702) 792-3773
 (702) 792-9002 (fax)

1 On October 6, 2017 Plaintiff served his initial disclosures;

2 On October 27, 2017 SLS served its initial disclosures;

3 On November 17, 2017 Plaintiff served his First Supplemental Disclosures;

4 On January 30, 2018 SLS served Request for Admissions, Request for Production of
5 Documents and Interrogatories on Plaintiff;

6 On January 31, 2018 Plaintiff served Request for Admissions, Request for Production and
7 Interrogatories of Documents on SLS;

8 On March 1, 2018 SLS served responses to Request for Admissions, Request for
9 Production of Documents and Interrogatories, and Supplemental Disclosures;

10 On March 5, 2018 Plaintiff served responses to Request for Admissions, Request for
11 Production of Documents and Interrogatories and Second and Third Supplemental Disclosures.

12 On March, 5, 2018 Plaintiff completed the 30(b)(6) deposition of SLS.

13 On March 9, 2018 SLS completed the deposition of Plaintiff.

14 **Specific Description of Discovery that Remains to be Completed**

15 1. No additional discovery is needed. However, the parties did not receive all
16 transcripts from the depositions completed in early March 2018 until late March 2018 and the
17 deadline for deponents to note any revisions to their depositions has not expired, preventing
18 preparation of dispositive motions. Additionally, a motion to dismiss Plaintiff's complaint
19 remains pending before the Court.

20 **C. Reasons Why the Remaining Discovery Was Not Completed**

21 The parties aver, pursuant to LR 6-1 and LR 26-4, that good cause exists for the requested
22 extension. At this juncture, discovery has closed in this matter. The parties previously stipulated
23 to extend pretrial deadlines to allow the completion of discovery. While the parties specifically
24 requested accelerated delivery of the deposition transcript and had anticipated having the
25 deposition transcripts with adequate time to prepare and submit dispositive motions, the
26 transcripts were not delivered as early as anticipated. The requested extension of the dispositive
27 motion deadline is to permit review of final deposition transcripts and prepare appropriate
28 dispositive motions. The parties are bringing this request now because they did not know at least

1 twenty-one (21) days prior to the pending dispositive motion deadline that the deposition
 2 transcripts would be delayed in delivery and if the Court would enter a ruling prior to the current
 3 dispositive motion deadline.

4 In order to have the necessary time to review the deposition transcripts and prepare
 5 dispositive motions, the parties request a thirty (30) day extension of the dispositive motion
 6 deadline, as well as the deadline to file a pre-trial order. This is their first request to extend the
 7 deadline to file dispositive motions and a pre-trial order.

8 **D. Proposed Discovery Deadlines**

<u>Event</u>	<u>Current Deadline</u>	<u>Proposed New Deadline</u>
Close of Discovery	Expired	Same
Deadline to Amend Pleadings	Expired	Same
Deadline to Disclose Initial Experts	Expired	Same
Deadline to Disclose Rebuttal Experts	Expired	Same
Dispositive Motions	April 4, 2018	May 4, 2018
Pre-Trial Order	May 4, 2018	June 4, 2018 ¹

19
20
21
22
23
24
25
26
27
28

///
///
///

¹ 30 days (June 3, 2018) is a Sunday.

Greenberg Traurig, LLP
Suite 400 North, 3773 Howard Hughes Parkway
Las Vegas, Nevada 89169
(702) 792-3773
(702) 792-9002 (fax)

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

IT IS SO STIPULATED.

DATED this 2nd day of April, 2018.

DATED this 2nd day of April, 2018

GREENBERG TRAURIG, LLP

KNEPPER & CLARK LLC

/s/ Michael Hogue
JACOB D. BUNDICK, ESQ.
Nevada Bar No. 9772
MICHAEL HOGUE, ESQ.
Nevada Bar No. 12400
3773 Howard Hughes Parkway, Suite 400 N
Las Vegas, NV 89169
Counsel for Defendant
Specialized Loan Servicing, LLC

/s/ Miles Clark
MATTHEW I. KNEPPER, ESQ.
Nevada Bar No. 12796
MILES N. CLARK, ESQ.
Nevada Bar No. 13848
10040 W. Cheyenne Avenue, Suite 170-109
Las Vegas, NV 89129

DAVID H. KRIEGER, ESQ.
HAINES & KRIEGER, LLC
Nevada Bar No. 9086
8985 S. Eastern Avenue, Suite 350
Henderson, NV 89123
Counsel for Plaintiff Troy A. Garcia

SCHEDULING ORDER

The above-set stipulated Discovery Plan of the parties shall be the Scheduling Order for this action pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1.

IT IS SO ORDERED

United States Magistrate Judge

Dated: 4-3-2018

CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(b), 45, I hereby certify that on April 2, 2018, a copy of the foregoing **STIPULATION FOR EXTENSION OF TIME (SECOND REQUEST)** was filed electronically via the Court’s CM/ECF system. Notice of filing will be served on all parties by operation of the Court’s CM/ECF filing system, and parties may access this filing through the Court’s CM/ECF system.

Attorneys for Plaintiff, Troy A. Garcia

Matthew I. Knepper, Esq.
Miles N. Clark, Esq.
Knepper & Clark
10040 W. Cheyenne Ave., Suite 170-109
Las Vegas, NV 89129
Matthew.knepper@knepperclark.com
Miles.clark@knepperclark.com

David H. Krieger
Haines & Krieger, LLC
8985 S. Eastern Avenue, Suite 350
Henderson, NV 89123
dkrieger@hainesandkrieger.com

Attorneys for Equifax Information Services, LLC

Bradley T. Austin
Snell & Wilmer LLP
3883 Howard Hughes Pkwy, Suite 1100
Las Vegas, NV 89169
baustin@swlaw.com

Natalie Young
An employee of GREENBERG TRAUERIG, LLP

Greenberg Traurig, LLP
Suite 400 North, 3773 Howard Hughes Parkway
Las Vegas, Nevada 89169
(702) 792-3773
(702) 792-9002 (fax)