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

12 TROY A. GARCIA,  
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 Plaintiff,  
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 v.  
 15 SPECIALIZED LOAN SERVICING LLC;  
 AMERICAN HONDA FINANCE CORP.;  
 16 TOYOTA FINANCIAL SERVICES; WELLS  
 FARGO CARD SERVICES; EQUIFAX  
 INFORMATION SERVICES, LLC,  
 17  
 Defendants.  
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Case No.: 2:17-cv-01721-RFB-VCF

**STIPULATION FOR EXTENSION OF  
 TIME**  
**THIRD REQUEST**

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 by ten (10)  
 22 days. At this time, the parties are not seeking an extension of any other discovery deadlines but  
 23 reserve the right to request in the future. In support of this Stipulation and Request, the parties  
 24 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.  
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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 had originally  
24 expected to file dispositive motions by the present deadline, scheduling conflicts and personal  
25 emergencies have delayed preparation of said motions. The requested extension of the dispositive  
26 motion deadline is to permit the parties to prepare appropriate dispositive motions. The parties are  
27 bringing this request now because they did not know at least twenty-one (21) days prior to the  
28 pending dispositive motion deadline that such complications would arise.

1 In order to have the necessary time to prepare appropriate dispositive motions, the parties  
 2 request a ten (10) day extension of the dispositive motion deadline. This is their third request to  
 3 extend the deadline to file dispositive motions.

4 **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	May 4, 2018	May 14, 2018
Pre-Trial Order	June 4, 2018	June 14, 2018

15 /// If dispositive motions are filed, the deadline for filing the joint pretrial order will be  
 16 suspended until 30 days after decision on the dispositive motions or further court order.

17 ///  
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**IT IS SO STIPULATED.**

DATED this 1st day of May, 2018.

DATED this 1st day of May, 2018

GREENBERG TRAURIG, LLP

KNEPPER & CLARK LLC

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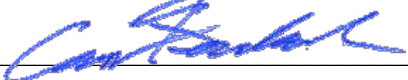
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**SCHEDULING ORDER**

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: 5-1-2018  
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**CERTIFICATE OF SERVICE**

Pursuant to Fed. R. Civ. P. 5(b), 45, I hereby certify that on May 1, 2018, a copy of the foregoing **STIPULATION FOR EXTENSION OF TIME (THIRD 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.

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*Natalie Young*  
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