1	JACOB D. BUNDICK, ESQ. Nevada Bar No. 9772							
2	MICHAEL HOGUE, ESQ. Nevada Bar No. 12400							
3	GREENBERG TRAURIG, LLP							
4	3773 Howard Hughes Parkway, Suite 400 N Las Vegas, Nevada 89169							
5	Telephone: (702) 792-3773 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							
	DISTRICT OF NEVADA							
11	TROY A. GARCIA,	Case No.: 2:17-cv-01721-RFB-VCF						
12	Plaintiff,							
13		STIPULATION FOR EXTENSION OF						
14	V.	TIME						
15	SPECIALIZED LOAN SERVICING LLC; AMERICAN HONDA FINANCE CORP.;	THIRD REQUEST						
16	TOYOTA FINANCIAL SERVICES; WELLS FARGO CARD SERVICES; EQUIFAX INFORMATION SERVICES, LLC,							
17								
18	Defendants.							
19	Pursuant to LR 6-1 and LR 26-4, Plain	tiff 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 ext	tend 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

Greenberg Traurig, LLP Suite 400 North, 3773 Howard Hughes Parkway Las Vegas, Nevada 89169 (702) 792-3773 (702) 792-3002 (fax)

## **DISCOVERY COMPLETED TO DATE** A.

26 Presently, the active parties to this case are Plaintiff and Specialized Loan Servicing, LLC ("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			

expected to file dispositive motions by the present deadline, scheduling conflicts and personal
emergencies have delayed preparation of said motions. The requested extension of the dispositive
motion deadline is to permit the parties to prepare appropriate dispositive motions. The parties are
bringing this request now because they did not know at least twenty-one (21) days prior to the
pending dispositive motion deadline that such complications would arise.

Greenberg Traurig, LLP Suite 400 North, 3773 Howard Hughes Parkway Las Vegas, Nevada 89169 (702) 792-3773 (702) 792-3002 (fax)

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

5	Event	<b>Current Deadline</b>	Proposed New
6			<u>Deadline</u>
7	Close of Discovery	Expired	Same
8	Deadline to Amend Pleadings	Expired	Same
9			
10	Deadline to Disclose Initial Experts	Expired	Same
11	Deadline to Disclose Rebuttal	Expired	Same
12	Experts		
13	Dispositive Motions	May 4, 2018	May 14, 2018
14	Pre-Trial Order	June 4, 2018	June 14, 2018

## D. Proposed Discovery Deadlines

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

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

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<ul> <li>HAINES &amp; KIRDER, LLC Nevada Bar No. 9086 8985 S. Eastern Avenue, Suite 350 Henderson, NV 89123 <i>Counsel for Plaintiff Troy A. Garcia</i></li> <li>SCHEDULING ORDER</li> <li>The above-set stipulated Discovery Plan of the parties shall be the Scheduling Order for the action pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1.</li> <li>IT IS SO ORDERED</li> <li>United States Magistrate Judge</li> <li>Dated: 5-1-2018</li> <li>Dated: 5-1-2018</li> </ul>	2DATED this 1st day of May, 2018.DATED this 1st day of May, 20183GREENBERG TRAURIG, LLPKNEPPER & CLARK LLC				
3       GREENBERG TRAURIG, LLP       KNEPPER & CLARK LLC         4       5 <i>K</i> / <u>Michael Hogue</u> <i>(s/_Miles N. Clark</i> 5 <i>(s/_Miles N. Clark</i> MATTHEW I. KNEPPER, ESQ.         6       Nevada Bar No. 12796       MICHAEL HOGUE, ESQ.         7       Nevada Bar No. 12400       Nevada Bar No. 12400         8       3773 Howard Hughes Parkway, Suite 400 N       Las Vegas, NV 89169         9       Counsel for Defendant       Nevada Bar No. 1348         9 <i>Counsel for Defendant</i> Specialized Loan Servicing, LLC         10       DAVID H. KRIEGER, ESQ.       HAINES & KRIEGER, LLC         11       Specialized Loan Servicing, LLC       DAVID H. KRIEGER, ESQ.         12       Garcia       Soched and No. 9086         13       Specialized Loan Servicing, LLC       DAVID H. KRIEGER, LLC         14       Sectial to an Servicing, LLC       DAVID H. KRIEGER, LLC         15       SCHEDULING ORDER         16       The above-set stipulated Discovery Plan of the parties shall be the Scheduling Order for the action pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1.         17       action pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1.         17       Bated:       51-2018         18       Dated: <th>3 GREENBERG TRAURIG, LLP KNEPPER &amp; CLARK LLC</th> <th></th>	3 GREENBERG TRAURIG, LLP KNEPPER & CLARK LLC				
GREENDERG TRACKING, ELT       KNETTER & CLARK ELC         4       K       Michael Hogue       (s/ Miles N. Clark         5       (s/ Miles N. Offactor       MATTHEW I. KNEPPER, ESQ.         6       Nevada Bar No. 12796       MILES N. CLARK, ESQ.         7       MICHAEL HOGUE, ESQ.       Nevada Bar No. 12796         8       3773 Howard Hughes Parkway, Suite 400 N       Io040 W. Cheyenne Avenue, Suite 170-109         18       Vegas, NV 89169       Las Vegas, NV 89129         10       Counsel for Defendant       Specialized Loan Servicing, LLC         10       DAVID H. KRIEGER, ESQ.       Henderson, NV 89123         11       Kevada Bar No. 986       8985 S. Eastern Avenue, Suite 350         12       Henderson, NV 89123       Counsel for Plaintiff Troy A. Garcia         13       SCHEDULING ORDER       The above-set stipulated Discovery Plan of the parties shall be the Scheduling Order for 1         14       United States Magistrate Judge       United States Magistrate Judge         14       Dated:       5-1-2018         15       Scheduli       Dated:         16       Dated:       5-1-2018         17       Action particle States Magistrate Judge       5-1-2018         18       Dated:       5-1-2018	I OKEENDERO TRAORIO, ELI KINEITER & CLARK ELC				
5       K       Michael Hogue       (s/       Miles N. Clark         1ACOB D. BUNDICK, ESQ.       MATTHEW I. KNEPPER, ESQ.         6       Nevada Bar No. 9772       Nevada Bar No. 12796         7       MICHAEL HOGUE, ESQ.       Nevada Bar No. 12400         8       373 Howard Hughes Parkway, Suite 400 N       Las Vegas, NV 89169         8       373 Howard Hughes Parkway, Suite 400 N       Las Vegas, NV 89129         9       Counsel for Defendant       Specialized Loan Servicing, LLC         10       David Bar No. 9086       8985 S. Eastern Avenue, Suite 350         11       Nevada Bar No. 9086       8985 S. Eastern Avenue, Suite 350         12       Henderson, NV 89123       Counsel for Plaintiff Troy A. Garcia         13       SCHEDULING ORDER       The above-set stipulated Discovery Plan of the parties shall be the Scheduling Order for 1         14       SCHEDULING ORDER         15       DORDERED         16       IT IS SO ORDERED         17       action pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1.         17       IT IS SO ORDERED         18       Dated:	1				
ACOB D. BUNDIČK, ESQ.       MATTHEW I. KNEPPER, ESQ.         Nevada Bar No. 9772       Nevada Bar No. 12796         MICHAEL HOGUE, ESQ.       MILES N. CLARK, ESQ.         Nevada Bar No. 12400       Nevada Bar No. 13848         373 Howard Hughes Parkway, Suite 400 N       10040 W. Cheyenne Avenue, Suite 170-109         Las Vegas, NV 89169       Las Vegas, NV 89129         Counsel for Defendant       Dato Specialized Loan Servicing, LLC         Nevada Bar No. 9086       Septimized Bar No. 9086         Specialized Loan Servicing, LLC       DAVID H. KRIEGER, ESQ.         HAINES & KRIEGER, LLC       Nevada Bar No. 9086         Specialized Loan Servicing, LLC       Nevada Bar No. 9086         Specialized Loan Servicing and the parties shall be the Scheduling Order for the action pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1.         The above-set stipulated Discovery Plan of the parties shall be the Scheduling Order for the action pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1.         United States Magistrate Judge       United States Magistrate Judge         Dated:       5-1-2018         Dated:       5-1-2018         Match       5-1-2018	4				
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7       Nevada Bar No. 12400       Nevada Bar No. 13848         8       3773 Howard Hughes Parkway, Suite 400 N       10040 W. Cheyenne Avenue, Suite 170-109         Las Vegas, NV 89169       Las Vegas, NV 89129         9       Counsel for Defendant         5       DAVID H. KRIEGER, ESQ.         11       Nevada Bar No. 9086         8895 S. Eastern Avenue, Suite 350         12       Nevada Bar No. 9086         13       SCHEDULING ORDER         14       ScheDuling Order for Plaintiff Troy A. Garcia         15       SCHEDULING ORDER         16       The above-set stipulated Discovery Plan of the parties shall be the Scheduling Order for the action pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1.         17       action pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1.         18       United States Magistrate Judge         19       Laster Science         21       Science         22       Dated: 5-1-2018         23       Science         24       Science         25       Science         26       Science         27       Science         28       Science         29       Science         20       Science<	MICHAEL HOGUE ESO MILES N CLAPK ESO				
Las Vegas, NV 89169       Las Vegas, NV 89129 <i>Counsel for Defendant Specialized Loan Servicing, LLC</i> DAVID H. KRIEGER, ESQ.         HAINES & KRIEGER, LLC       Nevada Bar No. 9086       8985 S. Eastern Avenue, Suite 350         Henderson, NV 89123 <i>Counsel for Plaintiff Troy A. Garcia</i> Counsel for Plaintiff Troy A. Garcia         SCHEDULING ORDER         The above-set stipulated Discovery Plan of the parties shall be the Scheduling Order for 1         action pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1.         IT IS SO ORDERED					
9       Counsel for Defendant Specialized Loan Servicing, LLC       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         11       SCHEDULING ORDER         13       The above-set stipulated Discovery Plan of the parties shall be the Scheduling Order for action pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1.         18       IT IS SO ORDERED         19		0-109			
Specialized Loan Servicing, LLC       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       Counsel for Plaintiff Troy A. Garcia         SCHEDULING ORDER       The above-set stipulated Discovery Plan of the parties shall be the Scheduling Order for taction pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1.         II       IT IS SO ORDERED         United States Magistrate Judge       Dated: 5-1-2018         Dated:       5-1-2018         Dated:       5-1-2018					
HAINES & KRIEGER, LLC Nevada Bar No. 9086 8985 S. Eastern Avenue, Suite 350 Henderson, NV 89123 Counsel for Plaintiff Troy A. Garcia Counsel for Plaintiff Troy A. Garcia SCHEDULING ORDER The above-set stipulated Discovery Plan of the parties shall be the Scheduling Order for the action pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1. IT IS SO ORDERED United States Magistrate Judge United States Magistrate Judge Dated: 5-1-2018 20 21 22 23 24 25 26 26 27 28	Counserjor Dejendani				
11       Nevada Bar No. 9086         8985 S. Eastern Avenue, Suite 350         Henderson, NV 89123         20         21         22         23         24         25         26         27         28					
22       33         33       Henderson, NV 89123 Counsel for Plaintiff Troy A. Garcia         44       SCHEDULING ORDER         45       SCHEDULING ORDER         46       The above-set stipulated Discovery Plan of the parties shall be the Scheduling Order for 1         47       action pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1.         48       IT IS SO ORDERED         49       United States Magistrate Judge         40       Dated:					
Counsel for Plaintiff Troy A. Garcia  Counsel for Plaintiff Troy A. Garcia  SCHEDULING ORDER  The above-set stipulated Discovery Plan of the parties shall be the Scheduling Order for the action pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1.  The above-set stipulated Discovery Plan of the parties shall be the Scheduling Order for the action pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1.  The above-set stipulated Discovery Plan of the parties shall be the Scheduling Order for the action pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1.  The above-set stipulated Discovery Plan of the parties shall be the Scheduling Order for the action pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1.  The above-set stipulated Discovery Plan of the parties shall be the Scheduling Order for the action pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1.  The above-set stipulated Discovery Plan of the parties shall be the Scheduling Order for the action pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1.  The above-set stipulated Discovery Plan of the parties shall be the Scheduling Order for the action pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1.  Discrete Scheduling Discrete	8985 S. Eastern Avenue, Suite 350				
Image: Section of the section pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1.         IT is SO ORDERED         IT is SO ORDERED         Inited States Magistrate Judge         Dated:       5-1-2018         IT is so or in the section of the section pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1.         IT is SO ORDERED         Inited States Magistrate Judge         Inited States Magist					
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IN       IT IS SO ORDERED         ID       IT IS SO ORDERED					
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20 United States Magistrate Judge 21	action pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1.				
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- 1 -	IT IS SO ORDERED United States Magistrate Judge Dated: 5-1-2018				
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	IT IS SO ORDERED United States Magistrate Judge				
	IT IS SO ORDERED United States Magistrate Judge Dated:				

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

1	CERTIFICATE OF SERVICE				
2	Pursuant to Fed. R. Civ. P. 5(b), 45, I hereby certify that on May 1, 2018, a copy of the				
3	foregoing STIPULATION FOR EXTENSION OF TIME (THIRD REQUEST) was filed				
4	electronically via the Court's CM/ECF system. Notice of filing will be served on all parties by				
5	operation of the Court's CM/ECF filing system, and parties may access this filing through the				
6	Court's CM/ECF system.				
7					
8 9	Attorneys for Plaintiff, Troy A. Garcia Matthew I. Knepper, Esq. Miles N. Clark, Esq.				
10	Knepper & Clark 10040 W. Cheyenne Ave., Suite 170-109				
11	Las Vegas, NV 89129 Matthew.knepper@knepperclark.com				
12	Miles.clark@knepperclark.com				
13	David H. Krieger				
14	Haines & Krieger, LLC 8985 S. Eastern Avenue, Suite 350				
15	Henderson, NV 89123 dkrieger@hainesandkrieger.com				
16					
17	Attorneys for Equifax Information				
18	Services, LLC Bradley T. Austin				
19	Snell & Wilmer LLP 3883 Howard Hughes Pkwy, Suite 1100				
20	Las Vegas, NV 89169				
21	baustin@swlaw.com				
22					
23	Natalie Young				
24	An employee of GREENBERG TRAURIG, LLP				
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Greenberg Traurig, LLP Suite 400 North, 3773 Howard Hughes Parkway Las Vegas, Nevada 89169 (702) 792-9002 (fax)