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10 *Attorneys for Plaintiff, Deutsche Bank National Trust Company as Trustee for GSAMP Trust*
 11 *2007-FM2, Mortgage Pass-Through Certificates, Series 2007-FM2*

12 **UNITED STATES DISTRICT COURT**
 13 **DISTRICT OF NEVADA**

14 DEUTSCHE BANK NATIONAL TRUST
 15 COMPANY AS TRUSTEE FOR GSAMP
 16 TRUST 2007-FM2, MORTGAGE
 17 PASSTHROUGH CERTIFICATES, SERIES
 18 2007-FM2,
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 20 Plaintiff,
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 22 vs.
 23 ABSOLUTE COLLECTION SERVICES, LLC,
 24 a Nevada Limited Liability Company; and
 25 ELKHORN COMMUNITY ASSOCIATION,
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 27 Defendants.

Case No.: 2:17-cv-02436-APG-VCF

**STIPULATION AND ORDER TO
 EXTEND DISCOVERY AND
 DISPOSITIVE MOTION DEADLINES**

(FIRST REQUEST)

19 Plaintiff Deutsche Bank National Trust Company as Trustee for GSAMP Trust 2007-
 20 FM2, Mortgage Pass-Through Certificates, Series 2007-FM2 (hereinafter “Plaintiff” or
 21 “Deutsche Bank”), Defendant Absolute Collection Services, LLC (“Absolute”), and Defendant
 22 Elkhorn Community Association (“HOA”) (collectively, the “Parties”), by and through their
 23 respective counsels of record, hereby jointly stipulate and agree to extend the time to conduct
 24 discovery and the dispositive motion deadline.

- 25 **A. DISCOVERY COMPLETED**
- 26 1. Plaintiffs’ Initial Disclosures.
 - 27 2. HOA’s Initial Disclosures.

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- 3. Absolute’s Initial Disclosures.
- 4. Plaintiff’s Expert Disclosures.
- 5. Plaintiffs’ written discovery (interrogatories, requests for production and requests for admission) to Absolute Collection Services, LLC.
- 6. Plaintiffs’ written discovery (interrogatories, requests for production and requests for admission) to Elkhorn Community Association.

B. DISCOVERY THAT REMAINS TO BE COMPLETED

- 1. Plaintiff’s deposition of Absolute Collection Services, LLC.
- 2. Plaintiff’s deposition of Elkhorn Community Association.
- 3. Defendants’ deposition of Plaintiff.
- 4. Absolute Collection Services, LLC’s responses to Plaintiff’s written discovery (interrogatories, requests for production and requests for admission).
- 5. Elkhorn Community Association’s responses to Plaintiff’s written discovery (interrogatories, requests for production and requests for admission).

C. REASON WHY DISCOVERY HAS NOT BEEN COMPLETED

Good cause justifies an extension of the deadlines at this time. Due to recent unexpected departures of primary handling attorneys at both offices for counsels of HOA and of Deutsche Bank, and the parties’ awareness of the potential value of certain discovery completed in a prior state court action (Case No. A-14-697880-C) in the Eighth Judicial District Court for Clark County, Nevada to resolving the claims, defenses and issues in this case, more time is needed for the newly assigned attorneys to review the discovery completed in that case, and assess their utility and evidentiary value in this action. The Parties reasonably believe that this additional time will lead to a more streamlined discovery process in this action, and promote significant savings in limited judicial resources as well as mutual costs of litigation for all parties. This is the parties’ first request and is not intended to cause undue delay.

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D. PROPOSED PRE-TRIAL DEADLINES AND DISCOVERY SCHEDULE

EVENT	CURRENT DATE	PROPOSED DATE
Discovery Cut-Off	May 21, 2018	August 20, 2018
Motions to Amend Pleadings/Add Parties	February 20, 2018	May 21, 2018
Expert Disclosures	March 22, 2018	June 20, 2018
Rebuttal Expert Disclosures	April 23, 2018	July 23, 2018
Dispositive Motions	June 20, 2018	September 18, 2018
Joint Pre-Trial Order	July 20, 2018	October 18, 2018

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.

E. CURRENT TRIAL DATE

No trial date is currently set in this action.

F. CONCLUSION

Accordingly, for good cause shown, the parties respectfully request that the Court enter the accompanying order to extend the aforementioned discovery and dispositive motion deadlines in this matter.

IT IS SO STIPULATED.

DATED this 8th day of May, 2018.

WRIGHT, FINLAY & ZAK, LLP

ABSOLUTE COLLECTION SERVICES, LLC

/s/ Yanxiong Li, Esq.

/s/ Shane D. Cox, Esq.

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11 Association*

ORDER

10 **IT IS SO ORDERED.**



11 UNITED STATES MAGISTRATE JUDGE

12 DATED: 5-9-2018

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1 **CERTIFICATE OF SERVICE**

2 The undersigned, an employee of Wright, Finlay & Zak, LLP, hereby certifies that on the
3 8th day of May, 2018, a true and correct copy of **STIPULATION AND ORDER TO EXTEND**
4 **DISCOVERY AND DISPOSITIVE MOTION DEADLINES (FIRST REQUEST)** was
5 served electronically via the CM/ECF system to parties of interest as follows:

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/s/ Kelli Wightman
An Employee of Wright, Finlay & Zak, LLP