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6 | *Attorneys for Defendant  
JPMorgan Chase Bank, National Association*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

SHIRLEY L. ROOP, an individual;

Plaintiff,

V.

JPMORGAN CHASE BANK, N.A., a national banking association; WELLS FARGO BANK, N.A., a national banking association; EQUIFAX INFORMATION SERVICES, LLC, a foreign limited-liability company; EXPERIAN INFORMATION SOLUTIONS, INC., a foreign corporation; INNOVIS DATA SOLUTIONS, INC., a foreign corporation;

## Defendants.

CASE NO. 2:21-cv-00983-APG-EJY

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY DEADLINES**

**(First Request)**

Pursuant to LA IA 6-1, LR 7-1, and LR 26-3, Plaintiff Shirley L. Roop (“Plaintiff”) and Defendant JPMorgan Chase Bank, N.A. (“Chase”) (collectively, “the Parties”), by and through their respective counsel, hereby stipulate and request that the Court extend the discovery deadlines in this matter by 60 days. This is the Parties’ first request to extend the discovery deadlines.

**(a) Statement Specifying the Discovery Completed**

6 All Parties have served their initial disclosures pursuant to Fed. R. Civ. P.  
7 26(a)(1).

1 Plaintiff served her first set of Interrogatories, Requests for Production, and  
 2 Requests for Admissions to Chase on August 10, 2021. Chase has not yet served  
 3 responses.

4 **(b) Specific Description of Discovery that Remains to be Completed**

5 Chase needs to respond to Plaintiff's first set of Interrogatories, Requests for  
 6 Production, and Requests for Admission.

7 Chase needs to serve its first set of discovery requests.

8 The Parties have not taken any depositions or served any deposition requests.  
 9 All depositions still need to be taken.

10 The Parties have not started expert discovery.

11 **(c) The Reasons Why the Deadline Was Not Satisfied or the Remaining**  
 12 **Discovery Was Not Completed Within the Time Limits Set by the Discovery**  
 13 **Plan**

14 Good cause exists to extend the time to complete the above discovery in order to  
 15 permit Plaintiff and Chase to respond to and serve written discovery and depose  
 16 essential witnesses. Over the last three months, the Parties have engaged in good faith  
 17 settlement discussions, but were unfortunately not able to come to a resolution.

18 **(d) Proposed Schedule for Completing All Remaining Discovery**

19 The Parties propose a 60-day extension to complete discovery as follows:

20 <b>Event</b>	21 <b>Current Deadline</b>	22 <b>Proposed Deadline</b>
21 Expert Disclosures	22 October 18, 2021	23 December 17, 2021
22 Rebuttal Expert Disclosures	23 November 17, 2021	24 January 17, 2022
23 Close of Discovery	24 December 15, 2021	25 February 14, 2022
24 Dispositive Motions	25 January 14, 2022	26 March 15, 2022

26 *[Continued on following page.]*

1           This is the first request for an extension, and it is made in good faith and not  
2 for purposes of delay.

3           Dated: November 18, 2021

4           BALLARD SPAHR LLP

LAW OFFICE OF KEVIN L. HERNANDEZ

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16           **ORDER**

17           IT IS SO ORDERED:

18             
19           \_\_\_\_\_  
20           UNITED STATES MAGISTRATE JUDGE

21           DATED: November 18, 2021