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*Attorneys for Defendant
JPMorgan Chase Bank, National Association*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SHIRLEY L. ROOP, an individual;
Plaintiff,
v.

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

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES**

(First Request)

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.

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

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

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

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 26 *[Continued on following page.]*
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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

5 By: /s/ Joel E. Tasca

By: /s/ Kevin L. Hernandez

6 Joel E. Tasca

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9 *Attorneys for Defendant*

Attorney for Plaintiff

JPMorgan Chase, National Association

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17 **ORDER**

18 IT IS SO ORDERED:

19 
20 UNITED STATES MAGISTRATE JUDGE

21 DATED: November 18, 2021
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