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7 *Attorneys for Defendant SoFi Bank, N.A.*

8 **UNITED STATES DISTRICT COURT**  
 9 **DISTRICT OF NEVADA**

10 Angela Bangert,  
 11 Plaintiff,  
 12 v.  
 13 SoFi Bank N.A., et al.,  
 14 Defendants.

Case No. 2:22-cv-01418-RFB-BNW  
**STIPULATION AND ORDER TO  
 AMEND DISCOVERY PLAN AND  
 SCHEDULING ORDER**  
 (Third Request)

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16 Defendant SoFi Bank, N.A. (“SoFi”)<sup>1</sup> and Plaintiff Angela Bangert (jointly, the  
 17 “Parties”), by and through their respective counsel, hereby stipulate and agree to  
 18 amend the Discovery Plan and Scheduling Order (ECF No. 37) by extending the  
 19 outstanding discovery deadlines for a period of sixty (60) days. This is the third request  
 20 for an extension to the Discovery Plan and Scheduling Order in this matter, and it is  
 21 sought in good faith and not for purposes of delay.

22 **I. Discovery Completed**

23 Plaintiff has served written discovery, including requests for production of  
 24 documents, requests for admission, and interrogatories, to SoFi, and SoFi has  
 25 responded. SoFi has served written discovery, including requests for production of  
 26 documents and interrogatories, to Plaintiff, and Plaintiff has responded. Plaintiff has

27 <sup>1</sup> Plaintiff has resolved her claims against Defendants Experian Information Solutions,  
 28 Inc. and Equifax Information Services, LLC.

1 taken the deposition of SoFi's 30(b)(6) representative, and SoFi has taken Plaintiff's  
2 deposition.

3 **II. Discovery That Remains to Be Completed**

4 Plaintiff has served additional notices of 30(b)(1) depositions of SoFi employees,  
5 which have not yet occurred. The Parties additionally still need to potentially serve  
6 additional written discovery, serve third-party subpoenas, conduct third-party  
7 depositions, and conduct expert discovery.

8 **III. Good Cause Exists for the Requested Extension**

9 The Parties initially stayed discovery pending settlement discussions.  
10 Following the stay, this Court granted an additional 30-day extension of the discovery  
11 plan. Although the Parties have cooperated in good faith during that time toward  
12 meeting their discovery obligations, as the facts in this case have continued to develop,  
13 and disagreements as to certain facts and discovery have arisen, it has become clear  
14 that the Parties require additional time to complete discovery, have effective  
15 conversations, and resolve specific discovery disagreements.

16 The additional time will allow the Parties to attempt to resolve the discovery  
17 issues between themselves, conduct additional fact discovery, and adequately  
18 determine whether expert discovery will be needed in this matter. Further, no party  
19 will be prejudiced by the Court granted this Stipulation, as all Parties jointly seek an  
20 extension of these deadlines. Moreover, the Parties believe that allowing the extension  
21 will serve the ends of judicial economy.

22 As further good cause, Plaintiff contends discovery yielded documents that were  
23 not timely produced as well as witnesses who were not disclosed until recently –  
24 Defendant disputes these contentions. In lieu of a Motion to Compel such information,  
25 the Parties are working together to amicably resolve the discovery dispute without the  
26 need for Court intervention.

27 **IV. Proposed Discovery Deadlines**

28 The Parties request an order extending the deadlines as set forth below.

- 1 • Discovery Cutoff 07/08/2024
- 2 • Deadline to Disclose Expert Disclosures 05/10/2024
- 3 • Deadline to Disclose Rebuttal Expert Disclosures 06/07/2024
- 4 • Deadline to File Dispositive Motions 08/23/2024
- 5 • Pretrial Order: The Parties shall file a joint pretrial order no later than
- 6 11/04/2024 or 30 days after the date set for filing dispositive motions. In the event that
- 7 Parties file dispositive motions, the date for filing the joint pretrial order shall be
- 8 suspended until 30 days after decision on the dispositive motion or further order of the
- 9 Court.

10 IT IS SO STIPULATED.

12 DATED this 8th day of May, 2024.

13 BALLARD SPAHR LLP

LOKER LAW, APC

14 By: /s/ Madeleine Coles

By: /s/ Matthew M. Loker

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23 **ORDER**

24 IT IS SO ORDERED:

25   
26 \_\_\_\_\_  
UNITED STATES MAGISTRATE JUDGE

27 DATED: May 9, 2024  
28 \_\_\_\_\_