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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

HSBC BANK USA, NATIONAL  
ASSOCIATION AS TRUSTEE FOR THE J.P.  
MORGAN ALTERNATIVE LOAN TRUST  
2006-A7,

Plaintiff,

v.

DONALD E. MACCORD et al.,

Defendants.

DONALD E. MACCORD,

Counterclaim Plaintiff,

v.

NATIONSTAR MORTGAGE, LLC, HSBC  
BANK USA, NATIONAL ASSOCIATION AS  
TRUSTEE FOR THE J.P. MORGAN  
ALTERNATIVE LOAN TRUST 2006-A7,

Counterclaim Defendants.

CASE NO. 2:17-cv-00877-RSM

STIPULATION AND ORDER TO  
EXTEND INITIAL SCHEDULING  
ORDER DATES

STIPULATION AND ORDER TO EXTEND INITIAL  
SCHEDULING ORDER DATES - 1  
Case No. 2:17-cv-00877-RSM



WITHERSPOON • KELLEY

Attorneys & Counselors

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STIPULATION

1  
2 Plaintiff/Counterclaim Defendant HSBC Bank USA, National Association (“HSBC”),  
3 Counterclaim Defendant Nationstar Mortgage, LLC, and Defendant/Counterclaim Plaintiff  
4 Donald E. MacCord (“Defendant/Counterclaim Plaintiff”) (jointly, the “Parties”), by and through  
5 their undersigned counsel, hereby stipulate to a 30 day extension of the deadlines enumerated in  
6 the Court’s June 15, 2017 Order Regarding Initial Disclosures, Joint Status Report, and Early  
7 Settlement, and respectfully request that the Court enter an Order to extend said deadlines, and,  
8 in requesting this extension of time state as follows.  
9

10 1. Defendant/Counterclaim Plaintiff removed this matter from King County  
11 Washington Superior Court on June 6, 2017. ECF 1.  
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13 2. On June 5, 2017, Defendant/Counterclaim Plaintiff filed his Answer and  
14 Counterclaim. ECF 5.

15 3. On June 15, 2017, the Court entered its Order Regarding Initial Disclosures, Joint  
16 Status Report, and Early Settlement (“Initial Scheduling Order”) setting forth deadlines in this  
17 matter regarding the filing of Initial Disclosures, the Joint Status Report, and for the FRCP 26f  
18 Conference. ECF 8.  
19

20 4. On July 5, 2017, Defendant/Counterclaim Plaintiff filed his Amended Answer and  
21 Counterclaims. ECF 12.  
22

23 5. In light of Defendant/Counterclaim Plaintiff’s recently filed Amended Answer and  
24 Counterclaims, the Parties agree, and hereby stipulate that, a 30 day extension of time is needed  
25 to comply with the Court’s Initial Scheduling Order.

26 6. The parties propose to extend the dates set forth in the Initial Scheduling Order as  
27 follows:  
28

	CURRENT DEADLINE	REVISED DEADLINE
Deadline for FRCP 26(f) Conference	7/13/2017	8/14/2017
Initial Disclosures Pursuant to FRCP 26(f)	7/20/2017	8/21/2017
Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f)	7/27/2017	8/28/2017

7. The Parties are not seeking this extension of time for the purpose of delay, and no party will suffer prejudice from the extension of time requested to comply with the Initial Scheduling Order.

WHEREFORE, the Parties hereby stipulate and respectfully request that the Court enter an Order to extend the deadlines of the Initial Scheduling Order 30 days, and that the new deadlines be set as provided in Paragraph 6, above, or for such dates as may be convenient for the Court.

Dated: July 17, 2017

CORR CRONIN MICHELSON  
BAUMGARDNER FOGG & MOORE  
LLP

s/ Todd T. Williams

Todd T. Williams, WSBA #29424  
CORR CRONIN MICHELSON  
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Counterclaim Plaintiff  
Donald E. MacCord*

Dated: July 17, 2017

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s/ Daniel Gibbons

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Bank USA, National Association,  
Nationstar Mortgage LLC, and Mortgage  
Electronic Registration Systems, Inc.*

1 Dated: July 17, 2017

2 MCCARTHY & HOLTHUS LLP

3 s/ Wendy L. Walter

4 Wendy L. Walter, WSBA #33809

5 MCCARTHY & HOLTHUS LLP

6 108 1st Ave. S., Ste. 300

7 Seattle, WA 98104

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10 *Attorneys for Plaintiff HSBC Bank USA,*

11 *National Association*



1 **ORDER**

2 Plaintiff/Counterclaim Defendant HSBC Bank USA, National Association, Counterclaim  
3 Defendant Nationstar Mortgage, LLC, and Defendant/Counterclaim Plaintiff Donald E. MacCord,  
4 by and through their respective attorneys of record, having stipulated to extend the dates set forth  
5 in this Court's June 15, 2017 Order Regarding Initial Disclosures, Joint Status Report, and Early  
6 Settlement for a period of thirty days, **NOW THEREFORE** for good cause shown, it is hereby  
7 **ORDERED, ADJUDGED, and DECREED** that the dates set forth therein be, and hereby are,  
8 extended for thirty days as follows:  
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11

	CURRENT DEADLINE	REVISED DEADLINE
12 Deadline for FRCP 26(f) Conference	7/13/2017	8/14/2017
13 Initial Disclosures Pursuant to FRCP 26(f)	7/20/2017	8/21/2017
14 Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f)	7/27/2017	8/28/2017

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19 Dated this 20<sup>th</sup> day of July 2017.  
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24 RICARDO S. MARTINEZ  
25 CHIEF UNITED STATES DISTRICT JUDGE  
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27  
28



1 *Presented by:*

2 WITHERSPOON · KELLEY

3 *s/ Daniel Gibbons*

4 Daniel J. Gibbons, WSBA# 33036

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24 *Agreed as to Form; Presentment Waived:*

25 CORR CRONIN MICHELSON

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27 LLP

28 *s/ Todd T. Williams*

Todd T. Williams, WSBA #29424

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*Counterclaim Plaintiff*

STIPULATION AND ORDER TO EXTEND INITIAL

SCHEDULING ORDER DATES - 5

Case No. 2:17-cv-00877-RSM



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