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17 *Attorneys for Defendants JPMorgan Chase Bank, N.A.,*
18 *Samantha Nelson f/k/a Samantha Kumbaleck,*
19 *Kristofer Nelson, Vikram Dadlani, and Jane Doe Dadlani*

20 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**
21 **IN AND FOR THE COUNTY OF MARICOPA**

22 PETER S. DAVIS, as Receiver of DENSCO
23 INVESTMENT CORPORATION, an Arizona
24 corporation,

25 Plaintiff,

26 v.

27 U.S. BANK, NA. a national banking
28 organization; HILDA H. CHAVEZ and JOHN
DOE CHAVEZ, a married couple;
JPMORGAN CHASE BANK, N.A., a national
banking organization; SAMANTHA NELSON
f/k/a SAMANTHA KUMBALECK and
KRISTOFER NELSON, a married couple, and
VIKRAM DADLANI and JANE DOE
DADLANI, a married couple,

Defendants.

NO. CV2019-011499

**JOINT STIPULATION TO
EXTEND CERTAIN DEADLINES**

(Assigned to the Hon. Dewain D. Fox)

1 Plaintiff Peter S. Davis, as Receiver of Densco Investment Corporation
2 (“Plaintiff”) and Defendants JPMorgan Chase Bank, N.A.; Samantha Nelson f/k/a
3 Samantha Kumbaleck; Kristofer Kelson; Vikram Dadlani; Jane Doe Dadlani; US Bank,
4 N.A.; and Hilda H. Chavez (“Defendants”) (collectively, the “Parties”), through
5 undersigned counsel, stipulate and request an Order from this Court briefly extending the
6 following deadlines:

7 1. Deadline for close of discovery, from January 13, 2023, to **January 31,**
8 **2023**, for the sole purpose of completing the depositions identified below;

9 2. Deadline for Defendants’ rebuttal expert reports, from February 2, 2023, to
10 **February 13, 2023;**

11 3. Deadline for final supplemental disclosures, from February 16, 2023, to
12 **February 27, 2023; and**

13 4. Deadline to conduct mediation, from February 2, 2023, to **April 30, 2023.**

14 Good cause exists for these extensions to allow undersigned counsel to complete
15 already-scheduled depositions of: incarcerated fact witness Yomtov Scott Menaged—
16 whose initial deposition was postponed due to a prison security breach; the remaining
17 Rule 30(b)(6) designee of U.S. Bank on the topic this Court allowed in its December 14,
18 2022 Minute Entry; and the four remaining witnesses for JPMorgan Chase Bank, N.A.
19 The brief extension for expert submissions is also appropriate to allow for consideration
20 of testimony given at the remaining depositions.

21 With respect to the deadline to conduct mediation, desired mediator availability
22 prevented the parties from scheduling a January session. Judge Oberbillig has been
23 engaged and mediation has been scheduled for April 20, 2023.

24 RESPECTFULLY SUBMITTED this 13th day of January, 2023.

25 GREENBERG TRAUIG, LLP

OSBORN MALEDON, P.A.

26 By: /s/ Nicole M. Goodwin

By: /s/ Colin F. Campbell

27 Nicole M. Goodwin

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1 ORIGINAL of the foregoing e-filed with the
2 Clerk of Court this 13th day of January 2023.

3 COPY of the foregoing electronically
4 distributed this 13th day of January 2023 to:

5 Hon. Dewain D. Fox

6 COPY of the foregoing served via
7 TurboCourt e-Service and E-Mail this 13th
8 day of January 2023 to:

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