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

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

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

Plaintiff,

v.

U.S. BANK, NA. a national banking
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. The deadline for the parties to submit final supplemental disclosures is
8 extended from February 27, 2023, to **March 7, 2023**.

9 2. The deadlines for the parties to complete expert depositions is extended
10 from March 17, 2023, to **April 21, 2023**; and

11 3. The deadline for the parties to submit dispositive motions is extended from
12 March 17, 2023, to **May 19, 2023**.

13 Good cause exists for these extensions to allow sufficient time to complete expert
14 depositions and prepare dispositive motions in light of the current schedule calling for
15 rebuttal expert reports to be served on February 13, 2023, and final supplemental
16 disclosures to be served on February 27, 2023. Under the current schedule, there are less
17 than three weeks between the latter date and the deadline to complete both expert
18 depositions (of which there could be as many as six, or more depending on the number of
19 rebuttal expert reports served) and preparation of dispositive motions. The brief extension
20 of the schedule set forth above is appropriate to allow for the efficient completion of all
21 expert discovery, as well as the consideration of the final supplemental disclosures in
22 connection with the preparation of dispositive motions.

23
24 RESPECTFULLY SUBMITTED this 16th day of February, 2023.
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OSBORN MALEDON, P.A.

2 By: /s/ Nicole M. Goodwin

By: /s/ Colin F. Campbell

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9 *Jane Doe Dadlani*

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11 By: /s/ Amanda Z. Weaver

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22 *Chavez*

1 ORIGINAL of the foregoing e-filed with the
2 Clerk of Court this 16th day of February 2023.

3 COPY of the foregoing electronically
4 distributed this 16th day of February 2023 to:

5 Hon. Dewain D. Fox

6 COPY of the foregoing served via
7 TurboCourt e-Service and E-Mail this 16th
8 day of February 2023 to:

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/s/ *Tammy Mowen*

Employee, Greenberg Traurig