

UNITED STATES DISTRICT COURT FOR
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

CASE NO. 24-22142-CIV-GAYLES/SHAW-WILDER

**FANNY B. MILLSTEIN and
MARTIN KLEINBART,**

Plaintiffs,

**v.
WELLS FARGO BANK, N.A.,**

Defendant.

**EXPEDITED JOINT MOTION FOR LEAVE TO FILE DISCOVERY MEMORANDA
FOR ZOOM DISCOVERY HEARING REGARDING PLAINTIFF'S REQUEST FOR
SCREENSHOTS TRACKING LIFE INSURANCE POLICIES**

The parties hereby move for leave to file discovery memoranda for the hearing via Zoom set by the Court and duly noticed for **October 31, 2025, at 1:00 p.m.** An expedited ruling is needed by **October 15, 2025**, because there is limited time remaining in advance of the hearing for the parties to brief the issues. The parties propose the following schedule: Plaintiff's initial filing, not to exceed two (2) pages in length, due no later than October 20, 2025; Defendant's response, not to exceed three (3) pages in length, due no later than October 24, 2025; and Plaintiff's reply to Defendant's response, not to exceed one (1) page in length, due no later than October 28, 2025.

As stated in the Notice of Hearing, the parties dispute whether non-party Computershare (the current custodian of the user interface of Wells Fargo's LIAP module of CCT Gateway after the sale of its trust business to Computershare) must produce screenshots of the LIAP module tracking certain life insurance policies in response to Plaintiff's First Request for Production.

Specifically, Plaintiff is seeking screenshots that contain information related to certain life insurance policies for which Wells Fargo was securities intermediary that Plaintiff claims relevant to the litigation. Defendant and Computershare take the position that production of the screenshots is superfluous to documents already produced and burdensome. The parties have been engaged in on-going conferrals since the inception of this case, which are memorialized in electronic communications. The parties believe that limited briefing will aid the Court in understanding the dispute and the systems at issue. Accordingly, the parties request leave to brief the Court to aid its analysis of this issue prior to the Court's October 31, 2025, scheduled hearing.

CONCLUSION

WHEREFORE, based on the foregoing, the parties' respectfully request the Court permit them to file discovery memoranda in advance of the hearing on this matter, in accordance with the schedule proposed herein.

Dated: October 9, 2025.

Respectfully submitted,

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Attorneys for Defendant Wells Fargo Bank, N.A.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 13, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF.

/s/ Seth Miles

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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
MIAMI AND WEST PALM BEACH DIVISIONS

CASE NO.: 24-cv-22142-GAYLES/SHAW-WILDER

FANNY B. MILLSTEIN and
MARTIN KLEINBART,

Plaintiffs,

v.

WELLS FARGO BANK, N.A.,

Defendant.

**[PROPOSED] ORDER GRANTING JOINT MOTION FOR LEAVE TO FILE
DISCOVERY MEMORANDA FOR ZOOM DISCOVERY HEARING
REGARDING PLAINTIFF'S REQUEST FOR
SCREENSHOTS TRACKING LIFE INSURANCE POLICIES**

THIS CAUSE having come before the Court on the parties' Joint Motion for Leave to File Discovery Memoranda for Zoom Discovery Hearing Regarding Plaintiff's Request for Screenshots Tracking Life Insurance Policies. D.E. __, it is hereby

ORDERED AND ADJUDGED that:

The Motion is GRANTED.

Plaintiff's initial filing, not to exceed two (2) pages in length, is due no later than October 20, 2025; Defendant's response, not to exceed three (3) pages in length, is due no

later than October 24, 2025; and Plaintiff's reply to Defendant's response, not to exceed one (1) page in length, is due no later than October 28, 2025.

DONE AND ORDERED in Chambers at Miami, Florida, this ____ day of October, 2025.

Detra Shaw-Wilder
UNITED STATES MAGISTRATE JUDGE

Copies furnished to: All Counsel of Record.