

1 **FERNALD LAW GROUP LLP**
 2 BRANDON C. FERNALD (SBN 10582)
 3 brandon.fernald@fernaldlawgroup.com
 4 6236 Laredo Street
 Las Vegas, Nevada 89146
 5 Tel: 702.410.7500
 6 Fax: 702.410.7520

7 Attorneys for Defendant,
 8 CAPITAL ONE BANK (USA), N.A.,
 9 Named as "Capital One, N.A."

10 **UNITED STATES DISTRICT COURT**
 11 **DISTRICT OF NEVADA**

12 ELEANOR MUNROE, an individual,
 13 Plaintiff,

14 v.

15 CAPITAL ONE, N.A.; EARLY
 16 WARNING SERVICES, LLC; JP
 17 MORGAN CHASE BANK, N.A.; AND
 18 LEXISNEXIS RISK SOLUTIONS, INC.
 19 Defendants.

Case No. 2:20-cv-00707-GMN-DJA

Assigned to Chief Judge Gloria A. Navarro; Referred to Magistrate Daniel J. Albregts

**STIPULATION AND
 [PROPOSED] ORDER TO
 EXTEND TIME TO RESPOND
 TO COMPLAINT**

(SECOND REQUEST)

Complaint Filed: April 21, 2020

1 Plaintiff Eleanor Munroe (“Plaintiff”), by and through her counsel of record,
2 and Defendant Capital One Bank (USA), N.A., named as “Capital One, N.A.”
3 (“Capital One”), by and through its counsel of record (collectively, the “Parties”),
4 hereby submit this stipulation to extend Capital One’s time to file a responsive
5 pleading to Plaintiff’s Complaint by fourteen (14) days, as follows:

6 **WHEREAS:**

- 7 1. Plaintiff filed the Complaint in this matter on April 21, 2020;
- 8 2. The Parties agree that a further brief extension of time for Capital One to
9 file its responsive pleading to the Complaint would benefit both Parties because it will
10 allow them to continue to gather additional facts and information while continuing to
11 devote their resources to exploring the potential for early resolution of this matter
12 before incurring further fees and costs;
- 13 3. The Parties agree this request is made in good faith and not for the
14 purposes of delay;
- 15 4. Capital One and Plaintiff have agreed to extend Capital One’s deadline
16 to respond to Plaintiff’s Complaint to June 22, 2020.

17 **NOW, THEREFORE, IT IS HEREBY STIPULATED THAT:**

18 Capital One will file its responsive pleading to Plaintiff’s Complaint on or
19 before June 22, 2020.

20
21 **IT IS SO STIPULATED.**

22 DATED: June 4, 2020

KNEPPER & CLARK LLC

23
24
25 By: /s/ Miles N. Clark
26 MILES N. CLARK
27 MATTHEW I. KNEPPER
28 Attorneys for Plaintiff,
ELEANOR MUNROE

DATED: June 4, 2020

FERNALD LAW GROUP LLP



By: /s/
BRANDON C. FERNALD
Attorneys for Defendant,
CAPITAL ONE BANK (USA), N.A.

IT IS SO ORDERED:

DATED: June 8, 2020



Daniel J. Albrechts
United States Magistrate Judge

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I, Brandon C. Fernald, declare that I am over the age of eighteen years and not a party to this action. I am employed in Clark County, and my business address is: Fernald Law Group LLP, 6236 Laredo Street, Las Vegas, Nevada 89146.

On June 5, 2020, I hereby certify that a true and complete copy of the foregoing documents:

1. STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME TO RESPOND TO COMPLAINT (SECOND REQUEST)

have been served by forwarding said copy on this the 5th day of June 2020 by transmitting via the Court’s ECF system the documents listed above to:

<p>Matthew I. Knepper Miles N. Clark Knepper & Clark LLC 5510 So. Fort Apache Rd., Ste. 30 Las Vegas, NV 89148 Tel: (702) 856-7430 Fax: (702) 447-8048 Email: matthew.knepper@knepperclark.com miles.clark@knepperclark.com <i>Attorneys for Plaintiff Eleanor Munroe</i></p>	<p>David H. Krieger Krieger Law Group, LLC 2850 W. Horizon Ridge Blvd., Ste. 200 Henderson, NV 89052 Tel: (702) 848-3855 Email: dkrieger@kriegerlawgroup.com <i>Attorneys for Plaintiff</i> Eleanor Munroe</p>
<p>Gary E. Schnitzer Kravitz, Schnitzer & Johnson, Chtd. 8985 S. Eastern Ave., S.te 200 Las Vegas, NV 89123 Tel: (702) 222-4142 Fax: (702) 362-2203 Email: gschnitzer@ksjattorneys.com <i>Attorneys for Defendant</i> LexisNexis Risk Solutions, Inc.</p>	<p>Meagan Mihalko Troutman Sanders 1001 Haxall Point Ste 1500 Richmond, VA 23219 Tel: (804) 697-1281 <i>Attorneys for Defendant</i> Early Warning Services, LLC (SERVICE BY FIRST CLASS USPS)</p>
<p>Joel Edward Tasca Ballard Sphar LLP 1980 Festival Plaza Drive Suite 900 Las Vegas, NV 89135 Tel: (702)-471-7000 Fax: (702) 471-7070 Email : tasca@ballardspahr.com <i>Attorneys for Defendant</i> JP Morgan Chase Bank, NA</p>	

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.



DATED: June 5, 2020

Brandon C. Fernald