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10 Attorneys for Defendant
Credit One Bank, N.A.

11
12 UNITED STATES DISTRICT COURT
13 EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO DIVISION
14

15 ROBERT ORTIZ,

16 Plaintiff,

17 v.

18 Experian Information Solutions, Inc.; Equifax,
19 Inc.; Credit One Bank, N.A., Avant, Inc., and
DOES 1 through 100 inclusive,

20 Defendants.
21

Case No. 2:18-cv-00954-WBS-CKD

**STIPULATION TO EXTEND DEFENDANT
CREDIT ONE BANK, N.A.’S TIME TO
RESPOND TO COMPLAINT AND
[PROPOSED] ORDER**

Compl. Filed: April 17, 2018

Honorable William B. Shubb
Honorable Carolyn K. Delaney

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1 This Joint Stipulation to Extend Time to Respond to Complaint to May 25, 2018 is made by
2 and between Plaintiff Robert Ortiz (“Plaintiff”) and Defendant Credit One Bank, N.A. (“Credit
3 One”) through their respective counsel, in light of the following facts:

4 **RECITALS**

5 On April 20, 2018, Plaintiff served her Complaint on Credit One.

6 Credit One’s response to Plaintiff’s Complaint is due on or before May 11, 2018.

7 The parties agree to extend Credit One’s time to respond to the Complaint to May 25, 2018,
8 in order to give Credit One additional time to investigate Plaintiff’s claims and prepare a proper
9 response, and for the parties to potentially reach a resolution of this matter.

10 There is good cause to extend Credit One’s response deadline because Credit One requires
11 additional time to investigate Plaintiff’s allegations and prepare a proper response, and the parties
12 require additional time to consider a resolution of this matter.

13 Pursuant to Civil Local Rule 144, Plaintiff and Credit One stipulate that Credit One’s time to
14 respond to Plaintiff’s Complaint is extended to May 25, 2018.

15 This change in deadline will not alter the date of any event or any deadline already fixed by
16 Court order, local rules, or the Federal Rules of Civil Procedure.

17 THEREFORE, the parties stipulate as follows:

18 **STIPULATION**

19 The deadline for Credit One to respond to the Complaint shall be continued to May 25, 2018.

20 This change in deadline will not alter the date of any event or any deadline already fixed by
21 the Court order, local rules, or the Federal Rules of Civil Procedure.

22 **IT IS SO STIPULATED.**

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DATED: May 11, 2018

REED SMITH LLP

By: /s/ Le Duong
Tuan Uong
Le T. Duong
Attorneys for Defendant
Credit One Bank, N.A.


DATED: May 11, 2018

SAGARIA LAW, P.C.

By: /s/ Elliot Gale
Elliot Gale
[As authorized on May 11, 2018]
Attorney for Plaintiff
Robert Ortiz

IT IS SO ORDERED.

Dated: May 11, 2018


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE