

1 Tuan Uong (SBN 272447)
 Email: tuong@reedsmith.com
 2 REED SMITH LLP
 355 South Grand Avenue
 3 Suite 2900
 Los Angeles, CA 90071-1514
 4 Telephone: +1 213 457 8000
 Facsimile: +1 213 457 8080

5
 6 Le T. Duong (SBN 297662)
 Email: lduong@reedsmith.com
 REED SMITH LLP
 7 101 Second Street
 Suite 1800
 8 San Francisco, CA 94105-3659
 Telephone: +1 415 543 8700
 9 Facsimile: +1 415 391 8269

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

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

15 JOYCE SIMPSON,
 16
 Plaintiff,
 17
 v.
 18 Experian Information Solutions, Inc., LLC,;
 19 Credit One Bank, N.A., and DOES 1 through 100
 inclusive,
 20
 Defendants.
 21

Case No. 2:18-cv-01166-TLN-KJN
**STIPULATION TO EXTEND DEFENDANT
 CREDIT ONE BANK, N.A.’S TIME TO
 RESPOND TO COMPLAINT AND ORDER**

Compl. Filed: May 9, 2018
 Honorable Troy L. Nunley
 Honorable Kendall J. Newman

REED SMITH LLP
 A limited liability partnership formed in the State of Delaware

22
 23
 24
 25
 26
 27
 28

1 This Joint Stipulation to Extend Time to Respond to Complaint to June 21, 2018 is made by
2 and between Plaintiff Joyce Simpson (“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 May 10, 2018, Plaintiff served her Complaint on Credit One.

6 Credit One’s response to Plaintiff’s Complaint is due on or before May 31, 2018.

7 The parties agree to extend Credit One’s time to respond to the Complaint to June 21, 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 June 21, 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 June 21, 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 ///

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

IT IS SO STIPULATED.

DATED: May 31, 2018

REED SMITH LLP

By: /s/ Le Duong

Tuan Uong
Le T. Duong
Attorneys for Defendant
Credit One Bank, N.A.

DATED: May 31, 2018

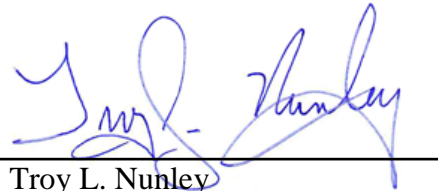
SAGARIA LAW, P.C.

By: /s/ Elliot Gale

Elliot Gale
[As authorized on May 31, 2018]
Attorney for Plaintiff
Joyce Simpson

IT IS SO ORDERED.

DATED: June 4, 2018



Troy L. Nunley
United States District Judge