

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

of time within which to answer or otherwise respond to the Complaint;

WHEREAS, pursuant to Local Rule 6-1(a), parties may stipulate in writing, without court order, to extend the time within which to answer or otherwise respond to the Complaint, provided the change will not alter the date of any event or any deadline already fixed by Court order,

WHEREAS, the parties have agreed to extend the deadline for Synchrony to answer or otherwise respond to the Complaint up to and including October 30, 2015;

WHEREAS, this extension will not alter the date of any event or any deadline already fixed by Court order;

THEREFORE, the parties stipulate and agree that Synchrony's response to the Complaint shall be due no later than <u>October 30, 2015</u>.

SO STIPULATED.

DATED:	September	30,	2015
--------	-----------	-----	------

## REED SMITH LLP

By /s/\_Raffi L. Kassabian\_

Raffi L. Kassabian Attorneys for Defendant Synchrony Bank f/k/a General Electric Capital Retail Bank

DATED: September 30, 2015

SAGARIA LAW, P.C.

By /s/Elliot Gale
Elliot Gale

Attorneys for Plaintiff Karen Sovath

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 hereby certify that on September 29, 2015, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the Electronic Mail Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on September 29, 2015.

DATED: September 29, 2015

## Respectfully Submitted,

## By /s/ Raffi L. Kassabian Raffi L. Kassabian (SBN 260358) Reed Smith LLP 355 South Grand Avenue **Suite 2900** Los Angeles, CA 90071 rkassabian@reedsmith.com +1 213.457.8000 Phone +1 213.457.8080 Fax

Attorneys for Defendant Synchrony Bank f/k/a General Electric Capital Retail Bank