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1 2 3 4 5 6 7 8 8	Shannon G. Splaine, Esq. Nevada Bar No. 8241 LINCOLN, GUSTAFSON & CERCOS 3960 Howard Hughes Parkway, Suite 200 Las Vegas, Nevada 89169 Tel: (702) 257-1997 Fax: (702) 257.2203 Email: ssplaine@lgclawoffice.com Attorney for Defendant Radius Solutions, L UNITED STATES	LC DISTRICT COURT							
9	DISTRICT OF NEVADA								
111 12 13 13 14 15 16 17 18 19 19 19 10 10 10 10 10	KATHRYN LONG, individually and on behalf of others similarly situated, Plaintiff, vs. TORRES CREDIT SERVICES, INC. and RADIUS SOLUTIONS, INC., Defendants.	Case No. 2:13-cv-01531-APG-VCF DEFENDANT, RADIUS SOLUTIONS, LLC'S, UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S FIRST AMENDED COMPLAINT COMPLAINT D D D D D D D D D D D D D D D D D D							
21 22 23 24 25 26		k/a Radius Solutions, LLC (Radius), through il procedure, files this Unopposed Motion for ff's First Amended Complaint, and states:							
28	Defendant Padius Solutions, LLO	C's Unopposed Motion for Extension							
- 1	l Defendant Radius Solutions, LLC	o onopposed modern for Extension							

1	1. (Эn	Decem	ber	23,	2013,	plaint	iff,	Kathryn	Long	(plaintiff),	served	her
amende	ed comp	plai	nt and	sum	mon	s on R	adius.	Ra	dius's res	sponsiv	e pleading	is curre	ently
due on .	January	y 13	, 2014.										

- 2. Undersigned counsel, however, requests additional time to review the file materials, conduct an investigation and confer with his client in order to draft an appropriate responsive pleading. In addition, the extension will allow the parties the time necessary to engage in meaningful and good-faith settlement negotiations in hopes the parties can reach a mutually agreeable resolution without the Court's involvement.
- 3. Plaintiff, through counsel, has agreed to allow Radius an extension of time through and including January 31, 2014 to respond to the complaint.

WHEREFORE, Defendant, Radius Solutions, LLC, respectfully requests this Court grant it an extension through and including January 31, 2014 to respond to the complaint, and for such other relief as this Court deems proper.

Respectfully submitted this 13 day of January, 2014.

LINCOLN, GUSTAFSON & CERCOS

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

DATED: 1-14-2014

Shannon G. Splaine, Esq. Nevada Bar No. 8241

3960 Howard Hughes Parkway, Suite 200

Las Vegas, Nevada 89169 Attorney for Defendant,

Radius Solutions, LLC

CERTIFICATE OF SERVICE

I certify that on this 13th day of January 2014, a copy of the foregoing was filed electronically in the ECF system. Notice of this filing will be sent to the parties of record by operation of the Court's electronic filing system, including Plaintiff's counsel as described below. Parties may access this filing through the Court's system.

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Staci D. Ibarra, an employee of THE LAW OFFICES OF

LINCOLN, GUSTAFSON & CERCOS

Defendant Radius Solutions, LLC's Unopposed Motion for Extension