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Attorney for Defendant Radius Solutions, LLC

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

KATHRYN LONG, individually and on behalf of others similarly situated,)	Case No. 2:13-cv-01531-APG-VCF
)	
Plaintiff,)	DEFENDANT, RADIUS SOLUTIONS,
)	LLC'S, UNOPPOSED MOTION FOR
vs.)	EXTENSION OF TIME TO RESPOND TO
)	PLAINTIFF'S FIRST AMENDED
)	COMPLAINT
TORRES CREDIT SERVICES, INC. and)	
RADIUS SOLUTIONS, INC.,)	
)	
Defendants.)	
)	
)	
)	
)	

Defendant, Radius Solutions, Inc. n/k/a Radius Solutions, LLC (Radius), through counsel and under the Federal Rules of Civil procedure, files this Unopposed Motion for an Extension of Time to Respond to Plaintiff's First Amended Complaint, and states:

Defendant Radius Solutions, LLC's Unopposed Motion for Extension

1. On December 23, 2013, plaintiff, Kathryn Long (plaintiff), served her amended complaint and summons on Radius. Radius's responsive pleading is currently due on January 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

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Radius Solutions, LLC

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

DATED: 1-14-2014

