1 JASON A. VANMEETREN, ESO. Nevada Bar No. 12511 2 E-mail: <u>jvm@AnthemLawNV.com</u> DAVID L. LANGHAIM, ESQ. 3 Nevada Bar No.: 12425 E-mail: dll@AnthemLawNV.com 4 ANTHEM LAW 5 5685 Cameron Street Las Vegas, Nevada 89118 6 Telephone: (702) 885-9897 Attorneys for Plaintiff 7 8 UNITED STATES DISTRICT COURT 9 DISTRICT OF NEVADA 10 DAVID BROWN, an individual, CASE NO.: 2:13-cv-02118-JCM-VCF 11 Plaintiff, 12 VS. 13 STIPULATION AND ORDER TO TRANS UNION LLC, a foreign corporation; EXTEND TIME FOR PLAINTIFF TO 14 EQUIFAX INFORMATION SERVICES LLC, a FILE AN OPPOSITION TO DEFENDANT foreign limited liability company; EXPERIAN BANK OF AMERICA'S MOTION TO 15 INFORMATION SOLUTIONS, INC., a foreign **DISMISS** 16 corporation; GREEN TREE SERVICING LLC, a foreign limited liability company; and BANK OF (First Request) 17 AMERICA, N.A., a foreign limited partnership and as successor to COUNTRYWIDE BANK, FSB. 18 Defendants. 19 20 21 Plaintiff David Brown and defendant Bank of America, N.A. for itself and as successor to 22 Countrywide Bank, FSB (BANA), by and through their respective counsel, stipulate and agree that 23 Plaintiff shall have an extension of time to file an Opposition to Defendant Bank of America's 24 Motion to Dismiss (ECF No. 21) by an additional ten (10) days until **February 3, 2014**. The response 25 is currently due on January 23, 2014. 26 This is Plaintiff's first request for an extension of this deadline. This stipulation is made in good 27 faith, and is not anticipated or intended to cause any delay to any party. 28

1 The reason for the request is that Plaintiff's counsel was only recently retained, and its counsel is 2 currently obtaining and reviewing the case in order to adequately participate in this litigation and 3 determine if settlement is possible. Plaintiff's counsel and defendant's counsel have discussed 4 settlement, and are hopeful the parties may resolve this matter prior to the anticipated extension 5 deadline of February 3, 2014. 6 DATED this 22<sup>nd</sup> day of January, 2014. 7 8 ANTHEM LAW **AKERMAN LLP** 9 /s/ David L. Langhaim /s/ Natalie L. Winslow 10 JASON A. VANMEETREN, ESQ. ARIEL STERN, ESQ. Nevada Bar No. 12511 Nevada Bar No. 8276 11 DAVID L. LANGHAIM, ESQ. NATALIE L. WINSLOW, ESQ. Nevada Bar No.: 12425 Nevada Bar No. 12125 12 5685 Cameron Street 1160 Town Center Drive, Suite 330 13 Las Vegas, Nevada 89118 Las Vegas, Nevada 89144 14 Attorneys for Plaintiff Attorneys for Defendant bank of America, N.A., for itself an as successor to Countrywide Bank, FSB 15 16 IT IS SO ORDERED. 17 18 Eliu C. Mahan 19 UNITED STATES DISTRICT JUDGE 20 Dated: January 24, 2014 21 22 23 24 25 26 27 28