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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

**NICHOLAS COLAIZZI,**

Plaintiff,

v.

**BANK OF AMERICA, N.A., and  
EQUIFAX INFORMATION  
SERVICES, LLC.,**  
Defendant.

**Case No.:** 2:14-cv-02053-GMN-NJK

**STIPULATION AND  
ORDER TO EXTEND TIME FOR  
PLAINTIFF TO RESPOND TO  
DEFENDANT'S MOTION TO  
DISMISS**

**[FIRST REQUEST]**

Plaintiff, NICHOLAS COLAIZZI (“Plaintiff”), and Defendant, BANK OF AMERICA, N.A. (“Defendant”), hereby submit the following Stipulation to Extend Time for Plaintiff to Respond to Defendant’s Motion to Dismiss. The current deadline is set for August 27, 2015.

1. Defendant filed its Motion to Dismiss Plaintiff’s First Amended Complaint [Dkt. No. 23] on August 10, 2015.
2. Plaintiff and Defendant have agreed to an extension of time of 14 days, up to and including September 10, 2015 for Plaintiff to respond to Defendant’s Motion To Dismiss.
3. This request is not made for purposes of delay, but rather to allow Plaintiff to fully brief the Motion brought by Defendant, and perhaps explore settlement.

The parties therefore respectfully request this Court enter an order granting an extension of time of 14 days, up to and including September 10, 2015, for Plaintiff to respond to Defendant’s Motion to Dismiss.

DATED: August 25, 2015


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**IT IS SO ORDERED**

  
\_\_\_\_\_  
Gloria M. Navarro, Chief Judge  
United States District Court

DATED: August 26, 2015

## SIGNATURE CERTIFICATION

Pursuant to Section 2(f)(4) of the Electronic Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to counsel for Defendant, and that I have obtained their authorization to affix their electronic signature to this document.

Dated: August 10, 2015

**KAZEROUNI LAW GROUP**

By: /s/ Danny Horen  
DANNY HOREN, ESQ.  
ATTORNEY FOR PLAINTIFF