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10 Attorneys for Defendant Volkswagen Group of
11 America, Inc.

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14 **UNITED STATES DISTRICT COURT**
15 **DISTRICT OF NEVADA**

16 ADAM SCHWARTZ, individually and on
17 behalf of all others similarly situated,

18 CASE NO.: 2:15-cv-1980-JCM-VCF

19 Plaintiff,

20 v.

21 VOLKSWAGEN GROUP OF AMERICA,
22 INC., A New Jersey Corporation,

23 **STIPULATION AND ORDER**

24 Defendant.

25 Pursuant to Local Rule 7-1, Defendant Volkswagen Group of America, Inc. ("VWGoA"),
26 through its counsel, Brownstein Hyatt Farber Schreck, LLP, and Plaintiff Adam Schwartz
27 ("Plaintiff") by and through his counsel, Lynch, Hopper, Salzano & Smith, LLP, and hereby
28 stipulate as follows:

- 29 1. This action was commenced by the filing of a complaint on October 13, 2015.
- 30 2. The time to respond has not expired.
- 31 3. Plaintiff has informed VWGoA that he intends to file an amended complaint and
32 that it is not necessary for VWGoA to respond to the current complaint.

1 WHEREFORE, the parties hereby stipulate and respectfully request that the Court enter
2 an Order extending the time for VWGoA to answer or otherwise respond to the Complaint to
3 permit Plaintiff time to file an Amended Complaint.

4 Dated: November 9, 2015

5 Dated: November 9, 2015

6 /s/ Jeffrey S. Rugg
7 JEFFREY S. RUGG, ESQ.
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11 /s/ Charles "Dee" Hopper
12 Charles "Dee" Hopper, Esq. (NV Bar No. 6346)
Sergio Salzano, Esq. (NV Bar No. 6482)
13 LYNCH, HOPPER, SALZANO & SMITH,
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Las Vegas NV 89106

15 Attorneys for Plaintiff

16 **ORDER**

17 IT IS SO ORDERED.



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19
20 UNITED STATES MAGISTRATE JUDGE

21 CASE NO.: 2:15-cv-01980-JCM-VCF

22 DATE: November 9, 2015

23 Submitted by:

24 /s/ Jeffrey S. Rugg
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IT IS FURTHER ORDERED that the
Amended Complaint must be filed
by November 23, 2015.