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10 *Attorneys for Defendant Credit One Bank, N.A.*

11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 JUAN MORENO, individually and on behalf
14 of all
others similarly situated,
15
Plaintiff,
16
vs.
17 CREDIT ONE BANK, N.A.,
18
Defendant.

Case No. 2:15-CV-02135-GMN-PAL

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE ANSWER TO
CLASS ACTION COMPLAINT**

(FIRST REQUEST)

19
20 Defendant Credit One Bank, N.A (“Credit One”), by and through its counsel at the law
21 firm of Snell & Wilmer L.L.P., and Plaintiff Juan Moreno (“Plaintiff”), by and through his
22 counsel at the law firms of Shook & Stone, Chtd. and Grant & Eisenhofer, P.A., hereby stipulate
23 as follows:

24 WHEREAS, Credit One was served with the Complaint and Summons in this action on
25 December 9, 2015, making its response due on December 31, 2015;

26 WHEREAS, Credit One needs time to investigate the Complaint’s allegations and confer
27 with Plaintiff’s counsel, and has only recently retained counsel to represent it in this action;
28

1 WHEREAS, the Parties agree that this Stipulation is not made for the purposes of delay,
2 and Plaintiff has agreed to Credit One's request that it be given an additional thirty (30) days to
3 respond to the Complaint, through February 1, 2016;

4 THEREFORE, the Parties hereby agree that Credit One shall have until February 1, 2016
5 to file a responsive pleading to Plaintiff's Complaint, and that any such pleading filed by that date
6 shall be deemed timely.

7 By entering into this stipulation, Credit One does not waive any of its defenses or
8 objections to the lawsuit, except that Credit One waives any objections to service of process of
9 the Complaint.

10 Dated this 23rd day of December, 2015.

Dated this 23rd day of December, 2015.

11 SNELL & WILMER L.L.P.

SHOOK & STONE, CHTD.

12 By: /s/Marek P. Bute

By: /s/Leonard H. Stone

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*Attorneys for Defendant
Credit One Bank, N.A.*

ORDER

22 **IT IS SO ORDERED** that Defendant Credit One Bank, N.A. shall have until February 1,
23 2016 to file a responsive pleading to Plaintiff's Class Action Complaint in the above-captioned
24 matter.

25 DATED this 5 day of January 20116.

26
27 
28 _____
UNITED STATES DISTRICT JUDGE