1 Michael Kind, Esq. NV Bar No. 13903 KAZEROUNI LAW GROUP, APC 3 7854 W. Sahara Avenue Las Vegas, NV 89117 4 Phone: (800) 400-6808 x7 5 FAX: (800) 520-5523 mkind@kazlg.com 6 7 David H. Krieger, Esq. NV Bar No. 9086 8 HAINES & KRIEGER, LLC 9 8985 S. Eastern Avenue, Suite 350 Henderson, Nevada 89123 10 Phone: (702) 880-5554 11 FAX: (702) 385-5518 dkrieger@hainesandkrieger.com 12 13 Attorneys for Plaintiff Alexander Stepanov 14 15 16 17

## UNITED STATES DISTRICT COURT **DISTRICT OF NEVADA**

18 19	ALEXANDER STEPANOV,	Case No: 2:15-cv-02270-APG-NJK
20 21	Plaintiff, v.	STIPULATION AND ORDER FOR AN EXTENSION OF TIME FOR PLAINTIFF TO
22	BANK OF AMERICA, N.A.,	RESPOND TO DEFENDANT'S
23	SILVER STATE SCHOOLS CREDIT UNION, TOYOTA	MOTION TO DISMISS [First Request]
24	MOTOR CREDIT	[Institution]
25	CORPORATION, AND EXPERIAN INFORMATION	
26	SOLUTIONS, INC.,	
27	Defendants.	
28	Defendants.	

## STIPULATION AND ORDER

Plaintiff Alexander Stepanov ("Plaintiff") and Defendant Bank of America, N.A. ("BANA") (jointly as the "Parties"), by and through their respective counsel, hereby submit this stipulation for an extension of time for Plaintiff to respond to BANA's motion to dismiss [ECF No. 13].

WHEREAS, on August 5, 2015, Plaintiff her Complaint in the Eighth Judicial District Court, District of Nevada;

WHEREAS, this case was removed to this Court on December 1, 2015;

WHEREAS, BANA filed a Motion to Dismiss on December 18, 2015;

WHEREAS, Plaintiff's Response to BANA's Motion to Dismiss is due on January 4, 2016;

WHEREAS, the Parties agree to extend Plaintiff's time to respond to BANA's Motion to Dismiss to discuss potential resolution of this matter;

WHEREAS, this is the first request for an extension of this deadline by the Parties.

NOW, THEREFORE, in consideration of the foregoing, and for good cause, IT IS HEREBY STIPULATED AND AGREED, by and between the Parties as follows:

(1) Plaintiff shall have until January 25, 2016 to respond to BANA's Motion to Dismiss [ECF No. 13].

IT IS SO STIPULATED.

IT IS SO ORDERED.

UNITED STATES DISTRICT JUDGE Dated: January 5, 2016.

KAZEROUNI LAW GROUP, APC NEVADA, CALIFORNIA

STIP. TO EXTEND TIME 2 Case No.: 2:15-cv-02270-APG-NJK