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8 *Counsel for Defendant*  
 9 *Bank of America, N.A.*

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

14 KERRI L. VAN HORN,  
 15  
 Plaintiff,

Case No.: 2:15-cv-02345-RFB-CWH

16 v.

**STIPULATION AND [PROPOSED]  
 ORDER TO EXTEND TIME TO  
 RESPOND TO PLAINTIFF'S  
 FIRST AMENDED COMPLAINT**

17 ACCTCORP OF SOUTHERN NEVADA,  
 18 BANK OF AMERICA, N.A., FORD MOTOR  
 CREDIT COMPANY, LLC, OCWEN  
 19 LOAN SERVICING, LLC, CITIBANK, and  
 20 EXPERIAN INFORMATION SOLUTIONS,  
 INC.,

**[FIRST REQUEST]**

21 Defendants.  
 22

23 IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff Kerri L. Van  
 24 Horn, by and through her counsel of record, Kazerouni Law Group, APC, and Defendant Bank of  
 25 America, N.A. ("BANA"), by and through its counsel of record, the law firm of Greenberg Traurig,  
 26 LLP, that the deadline for BANA to file a response to Plaintiff's First Amended Complaint for  
 27 Damages Pursuant to the Fair Credit Reporting Act, 15 U.S.C. § 1681, et seq. [DOC 19] shall be  
 28 extended from January 25, 2016 to February 8, 2016.

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1 This request is made in good faith at this time and is not made simply to delay the  
2 proceedings. No previous request for an extension of time for this deadline has been made.

3 DATED this 26th day of January, 2016.

DATED this 26th day of January, 2016.

4 GREENBERG TRAUERIG, LLP

KAZEROUNI LAW GROUP, APC

5 /s/ Whitney L. Welch, Esq.

/s/ Michael Kind, Esq.

6 By: \_\_\_\_\_

By: \_\_\_\_\_

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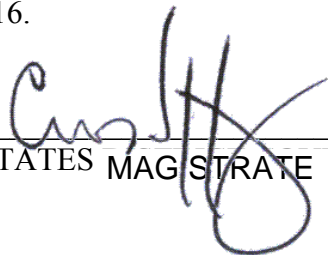
**[PROPOSED] ORDER**

Pursuant to the stipulation of the parties,

**IT IS HEREBY ORDERED, ADJUDGED AND DECREED** that the Stipulation and Order to Extend Time to Respond to Plaintiff's First Amended Complaint is hereby **GRANTED**.

**IT IS HEREBY FURTHER ORDERED** that the deadline for Defendant Bank of America, N.A. to file a response to Plaintiff's First Amended Complaint for Damages Pursuant to the Fair Credit Reporting Act, 15 U.S.C. § 1681, et seq. [DOC 19] shall be extended from January 25, 2016 to February 8, 2016.

**IT IS SO ORDERED** this 26th day of January, 2016.

  
UNITED STATES MAGISTRATE JUDGE

Respectfully submitted by:

GREENBERG TRAURIG, LLP

*/s/ Whitney L. Welch, Esq.*

By: \_\_\_\_\_

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**CERTIFICATE OF SERVICE**

Pursuant to Fed. R. Civ. P. 5(b), I hereby certify that on January 26, 2016, a copy of the foregoing **STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME TO RESPOND TO PLAINTIFF’S FIRST AMENDED COMPLAINT [FIRST REQUEST]** was filed electronically via the Court’s CM/ECF system. Notice of filing will be served on all parties by operation of the Court’s CM/ECF system, and parties may access this filing through the Courts’ CM/ECF system.

DATED this 26th day of January, 2016.

/s/ Shayna Noyce  
An employee of Greenberg Traurig, LLP

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