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7	Attorneys for Defendant,		
8	FORD MOTOR CREDIT COMPANY, LLC		
9			
10	UNITED STATES DISTRICT COURT		
11	DISTRICT OF NEVADA		
12	KERRI L. VAN HORN,	Case No. 2:15-cv-02345-RFB-CWH	
13	Plaintiff,		
14	vs.	STIPULATION FOR EXTENSION OF TIME FOR DEFENDANT	
15	ACCTCORP OF SOUTHERN NEVADA,	FORD MOTOR COMPANY, LLC	
16	BANK OF AMERICA, N.A., CAPITAL	TO FILE ITS REPLY IN SUPPORT OF ITS RENEWED	
16	ONE, FORD MOTOR CREDIT COMPANY, LLC, CITIBANK, and EXPERIAN	MOTION TO DISMISS	
17	INFORMATION SOLUTIONS, INC.,	(FIRST REQUEST)	
18	Defendants.		
19			
20	COMES NOW, Defendant Ford Motor Credit Company, LLC ("Defendant"), and		
21	Plaintiff Kerri L. Van Horn ("Plaintiff"), by and through their respective counsel, and hereby		
22	submit this Stipulation for Extension of Time for Defendant Ford Motor Credit Company, LLC		
23			
	to File Its Reply In Support Of Its Renewed Motion to Dismiss.		
24	WHEREAS, this case was removed to the	his Court on December 9, 2015 (Dkt. #1);	
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WHEREAS, Plaintiff filed her Amended Complaint January 7, 2016 (Dkt. #19);

WHEREAS, Defendant filed its Motion to Dismiss on December 21, 2015 (Dkt. #14);

WHEREAS, Defendant filed its Renewed Motion to Dismiss on January 20, 2016 (Dkt.

1	$= \frac{\#23}{3}$ ;
2	WHEREAS, Plaintiff filed its Opposition to Defendant's Motion to Dismiss on February
3	5, 2016 (Dkt. #35);
4	WHEREAS, Defendant's current deadline to reply is February 15, 2015;
5	WHEREAS, the Parties have stipulated that Defendant shall have up to and including
7	February 29, 2016, to file its reply;
8	WHEREAS, Defendant is in the process of obtaining the proper documents in order to
9	address specific issues and arguments raised in Plaintiff's Amended Complaint and Opposition
10	to Defendant's Renewed Motion to Dismiss. The facts contained in those documents will inform
11	Defendant which legal arguments it may appropriately raise in its reply;
12 13	WHEREAS, this is Defendant's first request for an extension of this deadline.
14	THEREFORE, in consideration of the foregoing, and for good cause, IT IS HEREBY
15	STIPULATED AND AGREED by and between the Parties as follows:
16	(1) The current deadline, of February 15, 2016, to reply to Plaintiff's Opposition to Defendant's
17	Motion to Dismiss is hereby vacated;
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1	(2) Defendant shall have up to and including February 29, 2016, to file its Reply In Support On		
2	Its Renewed Motion to Dismiss.		
3	IT IS SO STIPULATED.		
4	DATED this 12 <sup>th</sup> day of February, 2016.		
5		/s/ Matthew A. Walker	
6	/s/ Michael Kind Michael Kind	Gary E. Schnitzer, Esq.	
7	Nevada Bar No. KAZEROUNI LAW GROUP	Nevada Bar No. 395 Matthew A. Walker	
8	7854 W. Sahara Ave. Las Vegas, NV 89117	Nevada Bar No. 13275 KRAVITZ, SCHNITZER &	
9 10	Attorneys for Plaintiff	JOHNSON, CHTD. 8985 S. Eastern Ave., Ste. 200	
11		Las Vegas, NV 89123 Attorneys for Defendant	
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13	IT IS SO ORDERED.		
14	DATED this 15th day of February, 2016.		
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17		RICHARD F. BOULWARE, II United States District Judge	
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