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19 **UNITED STATES DISTRICT COURT**
20 **DISTRICT OF NEVADA**

<p>21 SUZANNE L. WALSH, 22 Plaintiff, 23 v. 24 BANK OF AMERICA, N.A., 25 CAPITAL ONE BANK USA, 26 N.A., SPECIALIZED LOAN 27 SERVICING, LLC, and 28 EQUIFAX INFORMATION SERVICES, LLC, Defendant.</p>	<p>Case No: 2:15-cv-02353-GMN-GWF</p> <p>STIPULATION AND PROPOSED ORDER FOR AN EXTENSION OF TIME FOR PLAINTIFF TO RESPOND TO DEFENDANT’S MOTION TO DISMISS [First Request]</p>
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1 **STIPULATION AND PROPOSED ORDER**

2 Plaintiff Suzanne L. Walsh (“Plaintiff”), Defendant Bank of America, N.A.
3 (“BANA”) (jointly as the “Parties”), by and through their respective counsel,
4 hereby submit this stipulation for an extension of time for Plaintiff to respond to
5 BANA’s motion to dismiss [ECF No. 7].

6 WHEREAS, on December 09, 2015, Defendant Capital One Filed a Petition
7 for Removal of Plaintiff’s Complaint for Damages filed in the Eighth Judicial
8 District Court, District of Nevada, ECF No. 1;

9 WHEREAS, on December 14, 2015, BANA filed its Motion to Dismiss the
10 Complaint, ECF No. 7;

11 WHEREAS, a Response to BANA’s Motion to Dismiss is due on December
12 12/31/15, ECF No. 7;

13 WHEREAS, the Parties are discussing the possible early resolution in this
14 case and it is likely that the Parties will reach a settlement within 30 days.

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

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1 NOW, THEREFORE, in consideration of the foregoing, and for good cause,
2 IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff and
3 BANA as follows:

4 (1) Plaintiff shall have until January 21, 2016 to respond to BANA's Motion to
5 Dismiss [ECF No. 7].

6 **IT IS SO STIPULATED.**

7 DATED this 31st day of December 2015.

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10 **KAZEROUNI LAW GROUP, APC**

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28 IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE

DATED: January 6, 2016

1 **CERTIFICATION OF SERVICE**

2 I HEREBY CERTIFY pursuant to Rule 5 of the Federal Rules of Civil
3 Procedure that on December 31, 2015, the foregoing STIPULATION AND
4 PROPOSED ORDER FOR AN EXTENSION OF TIME FOR PLAINTIFF TO
5 RESPOND TO DEFENDANT’S MOTION TO DISMISS [First Request] was
6 served via CM/ECF to all parties appearing in this case.

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8 **KAZEROUNI LAW GROUP, APC**

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