

1 Robert W. Freeman  
Nevada Bar No. 3062  
2 Jason G. Revzin  
Nevada Bar No. 8629  
3 **LEWIS BRISBOIS BISGAARD & SMITH LLP**  
6385 South Rainbow Blvd., Suite 600  
4 Las Vegas, NV 89118  
Telephone: (702) 893-3383  
5 Fax: (702) 893-3789  
Email: [robert.freeman@lewisbrisbois.com](mailto:robert.freeman@lewisbrisbois.com)  
6 Email: [jason.revzin@lewisbrisbois.com](mailto:jason.revzin@lewisbrisbois.com)  
*Attorneys for Defendant State Farm Bank*

7  
8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10  
11 WILLIAM E. FLORENCE III, on behalf of himself  
and all others similarly situated,

12 Plaintiff,

13 v.

14 STATE FARM BANK,

15 Defendant.  
16

Case No.: 2:16-cv-00515-APG-GWF

**CLASS ACTION**

**STIPULATION AND ORDER FOR  
EXTENSION OF TIME TO ANSWER OR  
RESPOND TO COMPLAINT**

**(FIRST REQUEST)**

17 Defendant State Farm Bank and Plaintiff William E. Florence III, by and through counsel,  
18 and pursuant to Fed. R. Civ. P. 6(b), hereby stipulate and agree to an extension of time to answer or  
19 otherwise respond to the Complaint.

20 Plaintiff filed his Complaint on March 8, 2016. Defendant State Farm Bank was served with  
21 a copy of the summons and complaint on March 21, 2016. Pursuant to Fed. R. Civ. P. 12(a)(i), the  
22 deadline for State Farm Bank to respond to the Complaint is currently April 11, 2016. Plaintiff has  
23 agreed to permit Defendant State Farm Bank a short extension of an additional 30 days to respond to  
24 the Complaint, until and including May 11, 2016. This brief extension will allow Defendants to  
25 continue to investigate Plaintiff's allegations and to confer with Plaintiff's counsel regarding the  
26 same. This is the parties' first request for an extension of time to respond to the Complaint, and is  
27 not intended to cause any delay or prejudice to any party.

28 Therefore, Defendant and Plaintiff respectfully request that the Court grant an extension of

1 time for Defendant State Farm Bank to answer or otherwise respond to the Complaint until and  
2 including **May 11, 2016**.

3  
4 DATED: April 6, 2016

5 LEWIS BRISBOIS BISGAARD & SMITH LLP

6  
7 /s/ Jason G. Revzin

8 Robert W. Freeman  
9 Nevada Bar No. 3062  
10 Jason G. Revzin  
11 Nevada Bar No. 8629  
12 6385 South Rainbow Blvd., Suite 600  
13 Las Vegas, NV 89118  
14 Telephone: (702) 893-3383  
15 Fax: (702) 893-3789  
16 Email: [robert.freeman@lewisbrisbois.com](mailto:robert.freeman@lewisbrisbois.com)  
17 Email: [jason.revzin@lewisbrisbois.com](mailto:jason.revzin@lewisbrisbois.com)  
18 *Attorneys for Defendant State Farm Bank*

19 /s/ Michael Kind

20 Michael Kind, Esq.  
21 Kazerouni Law Group, APC  
22 7854 W. Sahara Ave  
23 Las Vegas, NV 89117  
24 Phone: (800) 400-6808 x 7  
25 Fax: (800) 520-5523  
26 [mkind@kazlg.com](mailto:mkind@kazlg.com)

27 David H. Krieger, Esq.  
28 Haines & Krieger, LLC  
8985 S. Eastern Avenue, Suite 130  
Henderson, NV 89123  
Phone: (702) 880-5554  
Fax: (702) 385-5518  
[dkrieger@hainesandkrieger.com](mailto:dkrieger@hainesandkrieger.com)  
*Attorneys for Plaintiff*

IT IS SO ORDERED:

29  
30 

31 GEORGE FOLEY, JR.  
32 United States Magistrate Judge

33 DATED: April 7, 2016

1 **CERTIFICATE OF SERVICE**

2 This is to certify that on the 6<sup>th</sup> of April, 2016, I filed **STIPULATION AND ORDER FOR**  
3 **EXTENSION OF TIME TO ANSWER OR RESPOND TO COMPLAINT (FIRST**  
4 **REQUEST)** with the Clerk of the Court using the CM/ECF system which will send notification of  
5 such filing to the following counsel:

6 Michael Kind, Esq.  
7 Kazerouni Law Group, APC  
8 7854 W. Sahara Ave  
9 Las Vegas, NV 89117  
10 Phone: (800) 400-6808 x 7  
11 Fax: (800) 520-5523  
12 [mkind@kazlg.com](mailto:mkind@kazlg.com)

13 David H. Krieger, Esq.  
14 Haines & Krieger, LLC  
15 8985 S. Eastern Avenue, Suite 130  
16 Henderson, NV 89123  
17 Phone: (702) 880-5554  
18 Fax: (702) 385-5518  
19 [dkrieger@hainesandkrieger.com](mailto:dkrieger@hainesandkrieger.com)

20  
21  
22  
23  
24  
25  
26  
27  
28  

\_\_\_\_\_  
/s/ Carrie S. Dunham

An Employee of  
LEWIS BRISBOIS BISGAARD & SMITH LLP