

KAZEROUNI LAW GROUP, APC
7854 W. Sahara Avenue
Las Vegas, NV 89117

1 Michael Kind, Esq. (SBN: 13903)
2 KAZEROUNI LAW GROUP, APC
3 7854 W. Sahara Avenue
4 Las Vegas, NV 89117
5 Phone: (800) 400-6808 x7
6 FAX: (800) 520-5523
7 mkind@kazlg.com

8 David H. Krieger, Esq. (SBN: 9086)
9 HAINES & KRIEGER, LLC
10 8985 S. Eastern Avenue, Suite 350
11 Henderson, Nevada 89123
12 Phone: (702) 880-5554
13 FAX: (702) 385-5518
14 dkrieger@hainesandkrieger.com

15 *Attorneys for Plaintiff*

16 **UNITED STATES DISTRICT COURT**
17 **DISTRICT OF NEVADA**

<p>18 Raymond Maldonado, <i>individually</i> 19 <i>and on behalf of all others</i> 20 <i>similarly situated,</i></p> <p>21 Plaintiff,</p> <p>22 v.</p> <p>23 HSBC Mortgage Services, Inc.,</p> <p>24 Defendant.</p>	<p>Case No.: 2:16-cv-00784-JAD-VCF</p> <p>STIPULATION FOR AN EXTENSION OF TIME FOR PLAINTIFF TO RESPOND TO DEFENDANT’S MOTION TO DISMISS [First Request]</p> <p>ORDER</p>
---	---

1 Plaintiff Raymond Maldonado (“Plaintiff”) and HSBC Mortgage Services,
2 Inc. (“Defendant”) (jointly as the “Parties”), by and through their respective
3 counsel, hereby submit this stipulation for a seven day extension of time for
4 Plaintiff to respond to Defendant’s motion to dismiss, ECF No. 16;

5 WHEREAS, on April 8, 2016, Plaintiff filed his Complaint, ECF No, 1;

6 WHEREAS, on October 18, 2016, Plaintiff filed his first Amended
7 Complaint, ECF No. 10;

8 WHEREAS, on November 11, 2016, Defendant filed its Motion to Dismiss
9 Plaintiff’s First Amended Complaint, ECF No. 16;

10 WHEREAS, Plaintiff has requested in good faith and not for the purpose of
11 delay, and Defendant agrees, for an additional seven days for Plaintiff to file his
12 response to Defendant’s motion to dismiss.

13 WHEREAS, this is the first request for an extension of this deadline by the
14 Parties;

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 NOW, THEREFORE, in consideration of the foregoing, and for good cause,
2 IT IS HEREBY STIPULATED AND AGREED, by and between the Parties as
3 follows: Plaintiff shall Respond to Defendant's Motion to Dismiss First Amended
4 Complaint, ECF No. 16, on or before **December 5, 2016**.

5 DATED this 27th day of November 2016.

6
7 **Kazerouni Law Group, APC**

8
9 By: /s/ Michael Kind
10 Michael Kind, Esq.
11 7854 W. Sahara Avenue
12 Las Vegas, NV 89117
13 800-400-6808 x7
14 Fax: 800-520-5523
15 Email: mkind@kazlg.com
16 *Attorneys for Plaintiff*

17
18 **Greenberg Traurig, LLP**

19
20 By: /S/ Louis Smith
21 Jacob D Bundick, Esq.
22 3773 Howard Hughes Parkway
23 Suite 400 North
24 Las Vegas, NV 89169

25
26 Louis Smith, Esq.
27 500 Campus Drive, Ste 400
28 Florham Park, NJ 07932
Attorneys for HSBC Mortgage Services, Inc.

IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE

DATED: November 28, 2016