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

13 AVIHOU MISHNIOT, an individual;
14
15 Plaintiff,
16
17 v.
18
19 INTERNATIONAL RECOVERY SYSTEMS,
20 LTD doing business as NATIONAL
21 RECOVERY SYSTEMS, a foreign corporation;
22
23 Defendants.

Case No.: 2:16-cv-01061-JAD-PAL

**STIPULATION AND ORDER TO
EXTEND TIME FOR PLAINTIFF TO
FILE A RESPONSE TO DEFENDANT’S
MOTION TO DISMISS FIRST
AMENDED COMPLAINT [ECF. No.
18] [First Request]**

24 Plaintiff, Avihou Mishniot (“Mr. Mishniot”), and Defendant, International Recovery
25 Systems, LTD doing business as National Recovery Systems, (“NRS”) have agreed to extend the
26 time for Mr. Mishniot to file an Response to NRS’s Motion to Dismiss First Amended Complaint
27 [ECF No. 18] to **September 16, 2016**. NRS filed its Motion to Dismiss First Amended
28 Complaint [ECF No. 18] on August 18, 2016 and the current response deadline is September 4,
2016;

Mr. Mishniot requests this extension given the upcoming holiday and to permit the
parties discuss possible resolution of this matter. This brief extension will allow the parties to
further explore settlement options without expending unnecessary attorneys’ fees and costs;

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This is the first request for an extension to respond to NRS's Motion to Dismiss First Amended Complaint [ECF No. 18], and this request is made in good faith and not for the purpose of delay.

Dated: September 1, 2016

Dated: September 1, 2016

FENNEMORE CRAIG, P.C.

LAW OFFICE OF KEVIN L. HERNANDEZ.

/s/ Douglas M. Cohen

/s/ Kevin L. Hernandez

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ORDER

IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE
Dated: September 2, 2016.