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≦ 10 17			
18	David Corrai,		Case No: 2:16-cv-01742-JAD-CWH
19 20	Plainti	iff,	Stipulation for Plaintiff to Amend the Complaint
21	CACH LLC		
22		dant	ORDER
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	STIPULATION
2	Pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure, Plaintiff
;	David Corral ("Plaintiff") and Defendant CACH, LLC ("Defendant") (jointly as the
-	"Parties"), by and through their respective counsel, hereby submit this stipulation
5	for Plaintiff to file a First Amended Complaint, attached hereto as Exhibit A,
5	pursuant to Local Rule 15-1.
,	WHEREAS, Plaintiff filed his Complaint on July 22, 2016, ECF No. 1;

WHEREAS, on August 30, 2016, Defendant filed its Answer to the Complaint, ECF No. 4;

WHEREAS, the deadline to amend pleadings is on November 28, 2016, ECF No. 8, p. 2, ¶ 2.

WHEREAS, Plaintiff seeks to amend his Complaint to include further allegations that Defendant recently violated the FDCPA;

WHEREAS, in good faith and in order to avoid unnecessary motion practice, Defendant has agreed to allow Plaintiff to amend the Complaint but reserves all rights as to any allegations in the Complaint;

WHEREAS, in stipulating to allow Plaintiff to amend the Complaint,Defendant does not hereby admit any of the allegations in the Complaint;

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KAZEROUNI LAW GROUP, APC 7854 West Sahara Avenue Las Vegas, Nevada 89117

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NOW, THEREFORE, in consideration of the foregoing, and for good cause, IT IS HEREBY STIPULATED AND AGREED, by and between the Parties as follows:

- Plaintiff shall file and serve the Amended Complaint attached hereto as Exhibit A promptly after this Court has entered an Order approving this Stipulation.
  - (2) Defendant shall file and serve its response to the Amended Complaint within 14 days after Plaintiff files the Amended Complaint.

DATED this 21st day of November 2016.

Respectfully Submitted,

## KAZEROUNI LAW GROUP, APC

By: <u>/s/ Michael Kind</u> Michael Kind, Esq. 7854 W. Sahara Avenue Las Vegas, NV 89117 *Attorneys for Plaintiff* 

## LEWIS ROCA ROTHGERBER CHRISTIE LLP =

By: <u>/s/</u> J. Christopher Jorgensen

J. Christopher Jorgensen

3993 Howard Hughes Parkway, Suite 600

Las Vegas, NV 89169

Attorneys for CACH, LLC

IT IS SO ORDERED:

UNITED STATES DISTRICT JUDGE DATED: November 21, 2016

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