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James Birkan

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JAMES BIRKAN,

Plaintiff,

vs.

SETERUS, INC.; TOYOTA
FINANCIAL SERVICES; FEDERAL
NATIONAL MORTGAGE
ASSOCIATION A/K/A FANNIE MAE;
EQUIFAX INFORMATION
SERVICES, LLC; INNOVIS DATA
SOLUTIONS, INC.,

Defendants.

Case No.: 2:16-cv-02060-APG-PAL

**STIPULATION TO EXTEND
DEFENDANT SETERUS, INC.'S
TIME TO RESPOND TO
COMPLAINT**

(FIRST REQUEST)

Compl. Filed: August 30, 2016

Hon. Judge Andrew P. Gordon
Hon. Mag. Judge Peggy A. Leen

1 This Stipulation to Extend Time to Respond to Complaint is made by and
2 between Plaintiff James Birkan (“Plaintiff”) and Defendant Seterus, Inc.
3 (“Seterus”) through their respective counsel, in light of the following facts:

4 RECITALS

5 A. Plaintiff filed the Complaint (“Complaint”) against Seterus on or
6 about August 30, 2016.

7 B. Seterus was served with the Complaint on September 19, 2016.

8 C. Seterus’ current deadline to respond is October 11, 2016.

9 D. The parties agreed to extend Seterus’ time to respond to the
10 Complaint through October 21, 2016, in order to give Seterus time to investigate
11 Plaintiff’s claims and prepare a proper response, and for the parties to discuss a
12 potential resolution of this matter.

13 E. There is good cause to grant this stipulation because Seterus requires
14 additional time to investigate Plaintiff’s claims and prepare a proper response,
15 and the parties require additional time to consider a resolution of this matter.

16 F. Pursuant to LR IA 6-2, Plaintiff and Seterus respectfully request that
17 the Court extend Seterus’ time to respond to Plaintiff’s Complaint through
18 October 21, 2016.

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STIPULATION

NOW, THEREFORE, Plaintiff and Seterus hereby stipulate and agree that Seterus has up to and including October 21, 2016, to file a response to Plaintiff's Complaint.

IT IS SO STIPULATED

DATED: October 6, 2016

LEWIS ROCA
ROTHGERBER CHRISTIE LLP

By: /s/ J Christopher Jorgensen
J Christopher Jorgensen
Attorneys for Defendant
Seterus, Inc.

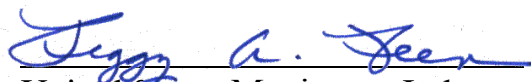
DATED: October 6, 2016

HAINES & KRIEGER, LLC

By: /s/ David H. Krieger
David H. Krieger, Esq.
Attorneys for Plaintiff
James Birkan

ORDER

IT IS SO ORDERED.


United States Magistrate Judge

Dated: October 7, 2016