

1 Kevin L. Hernandez, Esq.  
 Nevada Bar No. 12594  
 2 **LAW OFFICE OF KEVIN L.**  
**HERNANDEZ**  
 2510 Wigwam Parkway, Suite 206  
 3 Henderson, Nevada 89074  
 T: (702) 563-4450  
 4 F: (702) 552-0408  
 kevin@kevinhernandezlaw.com  
 5 *Attorney for Plaintiff*

6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8 CHARMAINE BUTKOWSKI, an individual;

Case No.: 2:16-cv-02220-JAD-GWF

9 Plaintiff,

10 v.

**JOINT MOTION AND ORDER TO  
 EXTEND TIME FOR DISMISSAL OF  
 DEFENDANT BLUESTEM BRANDS,  
 INC.**

11 BLUESTEM BRANDS, INC., d/b/a  
 FINGERHUT, a foreign corporation;  
 12 NAVIENT SOLUTIONS, INC., a foreign  
 corporation; EQUIFAX, INC., a foreign  
 13 corporation;

**(Third Request)**

14 Defendants.

15  
 16 Plaintiff, Charmaine Butkowski (“Plaintiff”) and Bluestem Brands, Inc. (“Bluestem”) (the “Parties”), under Fed. R. Civ. P. 6(b)(1)(a) and Local Rule IA 6-1, hereby move this Court for the entry of an Order extending the time for Plaintiff and Bluestem to review and execute settlement documents and for the Parties to prepare dismissal documents. In support of this Motion, the Parties refer the Court to the memorandum below:

21 **MEMORANDUM OF POINTS AND AUTHORITIES**

22 Rule 6(b)(1)(a) of the Federal Rules of Civil Procedure and Local Rule IA 6-1 provide that the Court may, for good cause, extend the time with or without motion or notice if the Court acts, or if a request is made, before the original time or its extension expires.

25 The Parties respectfully request an extension of time during which Plaintiff will review and sign the proposed settlement agreement and release with Bluestem. The Parties make this request in good faith and have good cause for the relief they seek. Plaintiff has been unable to review and execute the agreement due to ongoing health issues.

1 Based on the foregoing, Plaintiff respectfully requests that this Court enter an Order  
2 allowing them and additional thirty (30) days, through and including July 19, 2017, to allow for  
3 Plaintiff to recover and review the settlement documents, for the Parties to execute the settlement  
4 documents, and for the Parties to prepare dismissal documents. If the Parties have not submitted  
5 dismissal documents to the Court before July 19, 2017, they shall submit a joint status report by  
6 the same date.

7 Respectfully submitted.

8 Dated: June 19, 2017

Dated: June 19, 2017

9 **LAW OFFICE OF**  
10 **KEVIN L. HERNANDEZ**

**BALLARD SPAHR LLP**

11 /s/ Kevin L. Hernandez  
12 Kevin L. Hernandez, Esq.  
13 Nevada Bar No. 12594  
14 2510 Wigwam Parkway, Suite 206  
15 Henderson, Nevada 89074  
16 kevin@kevinhernandezlaw.com  
17 *Attorney for Plaintiff*

/s/ Kyle A. Ewing  
Joel E. Tasca  
Nevada Bar No. 14124  
Kyle A. Ewing  
Nevada Bar No. 14051  
100 North City Parkway, Suite 1750  
Las Vegas, Nevada 89106  
tasca@ballardspahr.com  
ewingk@ballardspahr.com  
*Attorneys for Defendant Bluestem Brands, Inc.*

18 **IT IS SO ORDERED.**

19   
UNITED STATES MAGISTRATE JUDGE

20 DATED: 6/20/2017