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1	Don Springmeyer Nevada Bar No. 1021
2	Bradley S. Schrager Nevada Bar No 10217
3	WOLF, RIFKIN, SHAPIRO, SCHULMAN & RABKIN, LLP
	3556 E. Russell Road, Second Floor Las Vegas, Nevada 89120
4	Telephone: 702.341-5200 Facsimile: 702.341.5300
5	dspringmeyer@wrslawyers.com bschrager@wrslawyers.com
6	
7	Kevin J. Stoops (admitted pro hac vice) (Michigan SBN # P64371)
8	SOMMERS SCHWARTZ, P.C.
9	One Towne Square, 17th Floor Southfield, Michigan 48076
0	Telephone: 248.236.5752
1	Facsimile: 248.936.2143 kstoops@sommerspc.com
2	Jason T. Brown (admitted pro hac vice) (New Jersey SBN# 035921996)
3	Nicholas Conlon (admitted pro hac vice)
4	(New Jersey SBN# 034052013) BROWN, LLC
5	111 Town Square Place, Suite 400
6	Jersey City, NJ 07310 Telephone: 201 630.0000
7	jtb@jtblawgroup.com nicholasconlon@jtblawgroup.com
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9	Attorneys for Plaintiffs MAUREEN CLARK and SONYA ALEXANDER
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	STIPULATION TO EXTEND TIME FOR PARTIES TO RE-SUBMIT PROPOSED NOTICE AND CONSENT-TO- SUE FORMS
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1	RECITALS		
2	On September 21, 2016, Plaintiffs MAUREEN CLARK and SONYA ALEXANDER		
3	("Plaintiffs") filed a putative class and collective action complaint in the United States Distri		
4	Court, District of Nevada (Dkt. #1);		
5	On June 22, 2018, Plaintiffs filed their Second Amended Class and Collective Complai		
6	(Dkt. #52);		
7	On March 31, 2019, the Court granted Plaintiffs' Pre-Discovery Motion for Condition		
8	Certification Pursuant to 29 U.S.C. § 216(b) and ordered the parties to meet and confer to correct		
9	certain deficiencies the Court identified in Plaintiffs' proposed notice to putative collective		
10	members, and to resubmit the proposed notice and consent-to-sue forms for the Court's approva		
11	within fourteen days, which falls on the pressent date of April 15, 2019 (Dkt. #65);		
12	The Parties have met and conferred to prepare revised proposed notice and consent-to-su		
13	forms, but have not yet agreed upon final versions for submission to the Court. The Parties ar		
14	confident that if given seven (7) more days to confer, they will reach an agreement on revise		
15	documents to file for the Court's aproval;		
16	<u>STIPULATION</u>		
17	NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between		
18	Plaintiffs and Defendant, through their respective undersigned counsel of record, that:		
19	1. The Parties will have until April 22, 2019 to resubmit the proposed notice and consent		
20	to-sue forms for the Court's approval, an extension of 7 days;		
21	IT IS SO STIPULATED.		
22	DATED: April 15, 2019 WOLF, RIFKIN, SHAPIRO, SCHULMAN &		
23	RABKIN, LLP		
24			
25	By: <u>/s/ Don Springmeyer</u> Don Springmeyer, Esq.		
26	Attorneys for Plaintiffs		
27	MAUREEN CLARK and SONYA ALEXANDER		
28			

1	DATED: April 15, 2019 MCGUIREWOODS LLP		
2	By:/s John Van Hook		
3	Michael D. Mandel, Esq. John A. Van Hook, Esq.		
4	30m 71. Van 1100k, 125q.		
5	Attorneys for Defendant BANK OF AMERICA, N.A.		
6	DAINK OF AMERICA, N.A.		
7	CEDTIFICATE OF SEDVICE		
8	<u>CERTIFICATE OF SERVICE</u>		
9	I hereby certify that on this 15th day of April, 2019, a true and correct copy		
10	of STIPULATION TO EXTEND TIME FOR PARTIES TO RE-SUBMIT PROPOSED		
11	NOTICE AND CONSENT-TO-SUE FORMS; was served via the United States District Court		
12	CM/ECF system on all parties or persons requiring notice.		
13			
14	By /s/ Christie Rehfeld Christie Rehfeld, an Employee of		
	WOLF, RIFKIN, SHAPIRO, SCHULMAN &		
15	RABKIN, LLP		
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1	UNITED STATES DISTRICT COURT			
2	DISTRICT OF NEVADA			
3	DISTRICT OF NEVADA			
4	MAUREEN CLARK and SONYA	CASE NO. 2:16-cv-02228- GMN-VCF		
5	ALEXANDER, individually, and on behalf of all others similarly situated,	[PROPOSED] ORDER GRANTING STIPULATION TO EXTEND TIME FOR PARTIES TO RE-SUBMIT PROPOSED NOTICE AND CONSENT-TO-SUE FORMS		
6	Plaintiff,			
7	VS.			
8	BANK OF AMERICA CORPORATION,			
9	Defendant.	Complaint Filed: September 21, 2016		
10				
11	[PROPOSED] ORDER			
12	Based on the Stipulation of the Parties and good cause appearing, the Court hereb			
13	GRANTS the Parties' Stipulation to Extent Time to Re-submit Proposed Notice and Consent-to			
14	Sue Forms, and Orders as follows:			
15	1. The Parties will have until April 22, 2019 to resubmit the proposed notice and consent			
16	to-sue forms for the Court's approval, an extension of 7 days;			
17	IT IC CO ODDEDED			
18	IT IS SO ORDERED.			
19	DATED this <u>15</u> day of April, 2019.			
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21	Gloria M. Navarro, Chief Judge			
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[PROPOSED] ORDER GRANTING STIPULATION TO EXTEND TIME FOR PARTIES TO RE-SUBMIT PROPOSED NOTICE AND CONSENT-TO-SUE FORMS