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5 Attorneys for Defendant  
 Experian Information Solutions, Inc.

7  
 8 **UNITED STATES DISTRICT COURT**  
 9 **DISTRICT OF NEVADA**

10 MICHAEL CALKINS,

11 Plaintiff,

12 v.

13 PORTFOLIO RECOVERY ASSOCIATES,  
 14 LLC, a foreign limited liability company; and  
 15 EXPERIAN INFORMATION SERVICES,  
 INC.

16 Defendants.

Case No. 2:16-cv-02628-RFB-VCF

**STIPULATION TO CONTINUE  
 DISPOSITIVE MOTION DEADLINE AS  
 TO EXPERIAN INFORMATION  
 SOLUTIONS, INC.**

**[FOURTH REQUEST]**

Complaint filed: November 15, 2016

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 18 Plaintiff Michael Calkins (“Plaintiff”) and Defendants Experian Information Solutions,  
 19 Inc. (“Experian”) and Portfolio Recovery Associates, LLC (“Portfolio”) by and through their  
 20 respective counsel, hereby move the Court to request a 14-day extension of the dispositive motion  
 21 deadline currently set for November 20, 2017 as to Experian.<sup>1</sup>

22 Good cause exists to grant this extension as Defendant Experian is currently engaged in  
 23 settlement discussions with Plaintiff which are aimed at resolving this case as to Experian in full.  
 24 An extension of the dispositive motion deadline will give the parties additional time to pursue all

25  
 26 <sup>1</sup> The parties previously entered into two stipulations to extend discovery and dispositive  
 27 motion deadlines. (ECF Nos. 21 and 23). Thereafter, at the hearing on Portfolio’s motion for  
 28 protective order held on October 5, 2017, the Court ordered the dispositive motion deadline be  
 extended to November 20, 2017. Therefore, the parties are treating this as the Fourth Request to  
 extend the dispositive motion deadline.

1 settlement possibilities before incurring the costs associated with preparing dispositive motions.

2 As such, Plaintiff, Experian, and Portfolio respectfully request a 14-day extension of the  
3 dispositive motion deadline for Experian making the new deadline December 4, 2017.

4 Dated this 15th day of November 2017.

5 THE LAW OFFICE OF VERNON  
6 NELSON

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7  
8 By: /s/ Vernon A. Nelson  
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By: /s/ Jennifer L. Braster  
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13 CHTD.

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19 *Attorneys for Portfolio Recovery Associates,  
20 LLC*

21 **IT IS SO ORDERED.**

22 Dated: 11-16-2017

  
\_\_\_\_\_  
23 HONORABLE CAM FERENBACH  
24 United States Magistrate Judge