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 5 *Attorney for Plaintiff Michael Calkins*

6 UNITED STATES DISTRICT COURT

7 STATE OF NEVADA

8 MICHAEL CALKINS,
 9 Plaintiff,

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

10 v.

11 PORTFOLIO RECOVERY ASSOCIATES,
 LLC, a foreign limited liability company; and
 12 EXPERIAN INFORMATION SERVICES,
 INC.

**STIPULATION AND ORDER TO
 EXTEND TIME FOR PLAINTIFF TO
 RESPOND TO MOTION FOR SUMMARY
 JUDGMENT**

(FIRST REQUEST)

13 Defendants.
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15 Pursuant to Local Rules IA 6-1, and IA 6-2, the parties, by and through their attorneys of
16 record hereby stipulate and request the court as follows:

17 1. This is the first stipulation for extension of time to allow Plaintiff MICHAEL
 18 CALKINS (“Plaintiff”) to respond to the Motion for Summary Judgment filed by Portfolio Recovery
 19 Associates, LLC., (“Defendant”) on November 6, 2017. (ECF No. 34)

20 2. The Plaintiff’s responsive pleading to the said Motion for Summary Judgment is due
 21 on November 27, 2017.

22 3. The parties agree to extend the Plaintiff’s time to file a responsive pleading to
 23 Defendants’ Motion for Summary Judgment in the above-caption matter from November 27, 2017 to
 24 December 4, 2017. Good cause exists for this request.

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THE LAW OFFICE OF VERNON NELSON
ATTORNEY AT LAW

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4. The extension is requested by Plaintiff's counsel due to a family emergency that has kept him out of the office, and therefore, counsel has been unable to attend to and respond to Defendants' Motion for Summary Judgment by November 27, 2017. This stipulation is not made for purposes of delay.

IT IS SO STIPULATED.

Dated: this 27th day of November, 2017.

KRAVITZ, SCHNITZER, & JOHNSON,
CHTD

By: /s/ Gina M. Mushmeche
Gina M. Mushmeche
Nevada Bar No. 10411
8985 S. Eastern Avenue, Suite 200
Las Vegas, NV 89123
Attorneys for Defendant Portfolio Recovery Associates, LLC

Dated: this 27th day of November, 2017.

THE LAW OFFICE OF VERNON NELSON, PLLC

By: /s/ Vernon Nelson
Vernon Nelson
Nevada Bar No. 6434
9480 South Eastern Avenue, Suite 252
Las Vegas, NV 89123
Attorneys for Plaintiff Michael Calkins

IT IS SO ORDERED.

Dated: This 30th day of November, 2017.



RICHARD F. BOULWARE, II
United States District Judge