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9 Attorney for Plaintiff Michael Calkins

6 UNITED STATES DISTRICT COURT

7 STATE OF NEVADA

8 MICHAEL CALKINS,

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

9 Plaintiff,

10 v.

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

**STIPULATION AND ORDER TO
EXTEND TIME FOR PLAINTIFF TO
RESPOND TO MOTION FOR SUMMARY
JUDGMENT
(FIRST REQUEST)**

Defendants.

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

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6 IT IS SO STIPULATED.

7 Dated: this 27th day of November, 2017.

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10 KRAVITZ, SCHNITZER, & JOHNSON,
11 CHTD

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14 By: /s/ Gina M. Mushmeche
15 Gina M. Mushmeche
16 Nevada Bar No. 10411
17 8985 S. Eastern Avenue, Suite 200
18 Las Vegas, NV 89123
19 *Attorneys for Defendant Portfolio Recovery
Associates, LLC*

20 Dated: this 27th day of November, 2017.

21 THE LAW OFFICE OF VERNON NELSON, PLLC

22

23 By: /s/ Vernon Nelson
24 Vernon Nelson
25 Nevada Bar No. 6434
26 9480 South Eastern Avenue, Suite 252
27 Las Vegas, NV 89123
28 *Attorneys for Plaintiff Michael Calkins*

29 IT IS SO ORDERED.

30 Dated: This 30th day of November, 2017.

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