

1 Jennifer L. Braster
 Nevada Bar No. 9982
 2 NAYLOR & BRASTER
 1050 Indigo Drive, Suite 200
 Las Vegas, NV 89145
 3 (T) (702) 420-7000
 (F) (702) 420-7001
 4 jbraster@naylorandbrasterlaw.com

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.**

[FIFTH REQUEST]

Complaint filed: November 15, 2016

17
 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 December 4, 2017 as to Experian.¹

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 However, Plaintiff and Experian have been unable to engage in settlement discussions due to

25 ¹ The parties previously entered into two stipulations to extend discovery and dispositive
 26 motion deadlines. (ECF Nos. 21 and 23). Thereafter, at the hearing on Portfolio’s motion for
 27 protective order held on October 5, 2017, the Court ordered the dispositive motion deadline be
 28 extended to November 20, 2017. On November 15, 2017, the Parties filed a Stipulation to Extend
 to the Dispositive Motion deadline as to Experian until December 4, 2017. Thus, the parties are
 treating this as the Fifth Request to extend the dispositive motion deadline.

1 unforeseen circumstances with Plaintiff's counsel.² An extension of the dispositive motion
2 deadline will give the parties additional time to pursue all settlement possibilities before incurring
3 the costs associated with preparing dispositive motions.

4 As such, Plaintiff, Experian, and Portfolio respectfully request a 14-day extension of the
5 dispositive motion deadline for Experian making the new deadline December 18, 2017.

6 Dated this 1st day of December 2017.

7 THE LAW OFFICE OF VERNON
8 NELSON

NAYLOR & BRASTER

9
10 By: /s/ Vernon A. Nelson
11 Vernon A. Nelson, Jr.
12 Nevada Bar No. 6434
13 9480 S. Eastern Ave., Ste. 244
14 Las Vegas, NV 89123

By: /s/ Jennifer L. Braster
Jennifer L. Braster
Nevada Bar No. 9982
1050 Indigo Drive, Suite 200
Las Vegas, NV 89145

15 *Attorneys for Plaintiff Michael Calkins*

*Attorneys for Defendant Experian Information
Solutions, Inc.*

16 KRAVITZ, SCHNITZER, & JOHNSON,
17 CHTD.

18 By: /s/ Gina M. Mushmeche
19 Gina M. Mushmeche
20 Nevada Bar No. 10411
21 8985 S. Eastern Ave., Suite 200
22 Las Vegas, NV 89123

23 *Attorneys for Portfolio Recovery Associates,
24 LLC*

25 **IT IS SO ORDERED.**

26 Dated: 12-4-2017

27 
28 HONORABLE CAM FERENBACH
United States Magistrate Judge

29 ² On November 27, 2017, the Parties file a Stipulation to Extend the time allowed for
30 Plaintiff to file an Opposition to Defendant Portfolio Recovery Associate's Motion for Summary
31 Judgment until December 4, 2017, which indicates Plaintiff's counsel has not been in the office
32 due to a family emergency and therefore unable to attend to and respond to the Motion for
33 Summary Judgment. (ECF No. 39). Similarly, Plaintiff's counsel has been unable to engage in
34 settlement discussions as intended.