

1 GINA M. MUSHMECHE, ESQ.  
 Nevada Bar No. 10411  
 2 KRAVITZ, SCHNITZER, & JOHNSON,  
 CHTD  
 3 8985 S. Eastern Avenue, Suite 200  
 Las Vegas, NV 89123  
 4 Telephone: 702-362-6666  
 Facsimile: 702-362-2203  
 5 gmushmeche@kssattorneys.com

6 Attorneys for Portfolio Recovery Associates, LLC

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

9 MICHAEL CALKINS,  
 10 Plaintiff,

11 v.

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

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

) **STIPULATION AND ORDER TO**  
 ) **EXTEND TIME FOR DEFENDANT**  
 ) **PORTFOLIO RECOVERY**  
 ) **ASSOCIATES, LLC TO RESPOND TO**  
 ) **PLAINTIFF MICHAEL CALKINS**  
 ) **OPPOSITION TO MOTION FOR**  
 ) **SUMMARY JUDGMENT**

) **(FIRST REQUEST)**

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 18 Pursuant to Local Rules IA 6-1, and IA 6-2, the parties, by and through their attorneys of  
 19 record hereby stipulate and request the court as follows:

20 1. This is the first stipulation for extension of time to allow Defendant Portfolio  
 21 Recovery Associates (“PRA”) to respond to the Opposition to the Motion for Summary  
 22 Judgment filed by Plaintiff on December 5, 2017 (ECF No. 43).

23 2. The PRA’s responsive pleading to the said Opposition to Motion for Summary  
 24 Judgment is due on December 19, 2017.

25 3. The parties agree to extend PRA’s time to file a Response to Plaintiff’s  
 26 Opposition to Motion for Summary Judgment in the above-caption matter from December 19,  
 27 2017 to January 5, 2018. Good cause exists for this request.  
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1 4. The extension is requested by PRA's counsel due to the fact counsel has been unable to  
2 attend to and respond to Plaintiff's Opposition to Motion for Summary Judgment. This  
3 stipulation is not made for purposes of delay.


4  
5 Dated: this 18<sup>th</sup> day of December, 2017. KRAVITZ, SCHNITZER, & JOHNSON, CHTD.

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7 By: /s/ Gina M. Mushmeche  
8 Gina M. Mushmeche, Esq.  
9 Nevada Bar No. 10411  
10 8985 S. Eastern Ave., Suite 200  
11 Las Vegas, NV 89123  
12 *Attorneys for Defendant Portfolio Recovery*  
13 *Associates, LLC*

14 Dated: this 18<sup>th</sup> day of December, 2017. NAYLOR & BRASTER

15 By: /s/ Jennifer L. Braster  
16 Jennifer L. Braster, Esq.  
17 Nevada Bar No. 9982  
18 1050 Indigo Dr., Suite 200  
19 Las Vegas, NV 89145  
20 *Attorneys for Defendant Experian Information*  
21 *Solutions*

22 Dated: this 18<sup>th</sup> day of December, 2017. THE LAW OFFICE OF VERNON NELSON,  
23 PLLC

24 IT IS SO ORDERED:  
25   
26 RICHARD F. BOULWARE, II  
27 United States District Judge

28 By: /s/ Vernon Nelson  
Vernon Nelson, Esq.  
Nevada Bar No. 6434  
9480 S. Eastern Ave., Suite 252  
Las Vegas, NV 89123  
*Attorneys for Plaintiff Michael Calkins*

DATED this 19th day of December, 2017.

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 18<sup>th</sup> of December, 2017, I served a copy of the foregoing **STIPULATION AND ORDER TO EXTEND TIME FOR DEFENDANT PORTFOLIO RECOVERY ASSOCIATES, LLC TO RESPOND TO PLAINTIFF MICHAEL CALKINS OPPOSITION TO MOTION FOR SUMMARY (FIRST REQUEST)** upon each of the interested parties via electronic service through the United States District Court for the District of Nevada's ECF system to the following:

Vernon A. Nelson, Jr., Esq.  
The Law Office of Vernon Nelson  
9480 S. Eastern Avenue, Suite 252  
Las Vegas, Nevada 89123  
*Attorneys for Plaintiff*

Jennifer L. Braster, Esq.  
Naylor & Braster  
1050 Indigo Drive, Suite 200  
Las Vegas, Nevada 89145  
*Attorneys for Experian Information Solutions*

By /s/ Annette Cooper  
An Employee of Kravitz, Schnitzer, Johnson, CHTD.