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Holdings, Inc. d/b/a AcctCorp of Southern
9 *Nevada and Parker & Edwards, Inc.*

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 LINDA COX,

13 Plaintiff,

Case Number: 2:16-cv-02914-APG-VCF

14 vs.

STIPULATION AND ORDER TO
EXTEND DISPOSITIVE MOTION
DEADLINE

15 RICHLAND HOLDINGS, INC. d/b/a
ACCOUNT CORP OF SOUTHERN
16 NEVADA, a Nevada Corporation; PARKER
& EDWARDS, INC., a Nevada Corporation;
17 and THE LANGSDALE LAW FIRM, P.C., a
Nevada professional corporation,

(FIRST REQUEST)

18 Defendants.
19

20 Plaintiff Linda Cox (“Plaintiff”) and Defendants Richland Holdings, Inc. d/b/a
21 AcctCorp of Southern Nevada (“AcctCorp”), Parker & Edwards, Inc., and The Langsdale
22 Law Firm, P.C. (together, the “Parties”), by and through their respective counsel of record,
23 hereby stipulate and jointly move the Court, pursuant to LR 26-4, for an Order Extending
24 the Dispositive Motion Deadline an additional thirty (30) days. The current deadline of
25 December 7, 2017 for dispositive motions would be extended to **January 5, 2018**.

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1 1. The deposition of Harry Jacobs, Principal of Safeguard Credit, LLC d/b/a
2 Credit Restoration of Nevada, is scheduled for December 7, 2017, to be conducted at the
3 Federal Courthouse. *See* ECF No. 61.

4 2. On November 15, 2017, this Court entered an Order on the Parties’
5 stipulation for Experian Information Solutions, Inc. to produce documents in response to
6 AcctCorp’s subpoena, production of which AcctCorp is currently awaiting. *See* ECF No. 64.

7 3. Accordingly, because these two outstanding issues may affect the content of
8 dispositive motions, the Parties submit that good cause exists to extend the dispositive
9 motion deadline from December 7, 2017, to **January 5, 2018**.

10 **IT IS SO STIPULATED.**

11 Dated this 20th day of November, 2017.

12 LAW OFFICE OF VERNON NELSON

13 /s/ Margaret G. Foley

14 VERNON A. NELSON, JR., ESQ.

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25 Las Vegas, Nevada 89123

26 Attorneys for Plaintiff Linda Cox

27

Dated this 20th day of November, 2017.

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/s/ Jared M. Moser

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Inc. and Parker & Edwards, Inc.

Dated this 20th day of November, 2017.

ROPERS, MAJESKI, KOHN & BENTLEY

/s/ Timothy J. Lepore

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Cox vs. Richland Holdings, Inc. et al., Case No. 2:16-cv-02914-APG-VCF
Stipulation and Order to Extend Dispositive Motion Deadline (First Request)

IT IS SO ORDERED:

DATED: November 20, 2017.



CAM FERENBACH
UNITED STATES MAGISTRATE JUDGE