

1 Cheryl L. O'Connor
 Nevada Bar No. 14745
 2 coconnor@jonesday.com
 Ryan D. Ball
 3 *Admitted Pro Hac Vice*
 rball@jonesday.com
 4 JONES DAY
 3161 Michelson Drive, Suite 800
 5 Irvine, CA 92612.4408
 Telephone: (949) 851-3939
 6 Facsimile: (949) 553-7539

7 Jennifer L. Braster
 Nevada Bar No. 9982
 8 NAYLOR & BRASTER
 1050 Indigo Drive, Suite 200
 9 Las Vegas, NV 89145
 Telephone: (702) 420-7000
 10 Facsimile: (702) 420-7001
 jbraster@naylorandbrasterlaw.com

11 *Attorneys for Defendant*
 12 *Experian Information Solutions, Inc.*

13 **UNITED STATES DISTRICT COURT**
 14 **DISTRICT OF NEVADA**

15 JOHN E. ASHCRAFT,
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 Plaintiff,
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 v.
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 19 EXPERIAN INFORMATION SOLUTIONS,
 INC.,
 20
 Defendant.

Case No. 2:16-cv-02978-JAD-NJK

**STIPULATION AND ORDER TO
 EXTEND RESPONSE AND REPLY
 BRIEFING DEADLINES**

[First Request]

22 Under Local Rules 6-1 and 7-2(b), Plaintiff John Ashcraft (“Plaintiff”) and Experian
 23 Information Solutions, Inc. (collectively, the “Parties”), by and through their respective counsel of
 24 record, hereby stipulate and request that this Court modify the briefing schedules for Plaintiff’s
 25 Motion for Class Certification and the Parties’ Motions for Summary Judgment. The deadline for
 26 Plaintiff to file his Motion for Class Certification and for the Parties to file Motions for Summary
 27 Judgment is currently set for December 14, 2018. (ECF Nos. 111, 120.) The Parties do not seek an
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1 extension of this deadline, but rather seek an extended briefing schedule on these motions
2 considering upcoming national holidays. This is the first request to extend the response and reply
3 briefing deadlines on Plaintiff's Motion for Class Certification and on the Parties' Motions for
4 Summary Judgment.

5 1. On February 21, 2017, the Court entered the Parties' proposed discovery plan and
6 scheduling order, which set the deadline for the parties to file Dispositive Motions on September
7 6, 2017. (ECF No. 12.)

8 2. On January 10, 2018, the Court granted Plaintiff leave to amend his Complaint to
9 add class claims. (ECF No. 77.) The Court ordered the parties to file a joint stipulation with new
10 proposed case deadlines. (*Id.*)

11 3. On January 17, 2018, the Parties filed a joint stipulation, proposing that the deadline
12 for Dispositive Motions and for Plaintiff's Motion for Class Certification be set for August 15,
13 2018. (ECF No. 79.)

14 4. On January 18, 2018, the Court adopted the Parties' proposed schedule. (ECF No.
15 80.)

16 5. On June 22, 2018, the Parties filed a joint stipulation to extend discovery deadlines,
17 which included a request that the deadline for Dispositive Motions and for Plaintiff's Motion for
18 Class Certification be set for November 14, 2018. (ECF No. 89.)

19 6. On June 26, 2018, the Court adopted the Parties' proposed schedule. (ECF No. 90.)

20 7. On October 29, 2018, the Court extended the Dispositive Motions deadline to
21 December 14, 2018. (ECF No. 111.)

22 8. On November 19, 2018, the Court extended the deadline for Plaintiff to file his
23 Motion for Class Certification to December 14, 2018. (ECF No. 120.)

24 9. Assuming Plaintiff files his Motion for Class Certification on December 14, 2018,
25 Experian's response to that motion would be due on December 28, 2018, with Plaintiff's reply due
26 on January 4, 2018. *See* D. Nev. L.R. 7-2(b).

27 10. Assuming the Parties file their respective Motions for Summary Judgment, if any,
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1 on December 14, 2018, the responses to such motions would be due on January 4, 2018, with replies
2 due on January 18, 2018. *See* D. Nev. L.R. 7-2(b).

3 11. These briefing schedules for Plaintiff's Motion for Class Certification and the
4 Parties' Motions for Summary Judgment overlap with multiple major national holidays.
5 Consequently, the Parties request that the briefing deadlines be reset as follows:

6 12. Dispositive Motions and Motion for Class Certification: **December 14, 2018** (no
7 change).

8 13. Response to Motion for Class Certification: **January 11, 2018**.

9 14. Responses to Dispositive Motions: **January 18, 2018**.

10 15. Reply in support of Motion for Class Certification: **January 18, 2018**.

11 16. Replies in support of Dispositive Motions: **February 1, 2018**.

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1 This is the Parties' first request to extend these briefing deadlines. The requested
2 extensions are being made in good faith and not for purposes of delay.


3 IT IS SO STIPULATED.

4 Dated: November 19, 2018

<p>5 <u>/s/ Jennifer L. Braster</u> 6 Jennifer L. Braster, Esq. (NBN 9982) 7 Andrew J. Sharples, Esq. (NBN 12866) 8 NAYLOR & BRASTER 9 1050 Indigo Drive, Suite 200 10 Las Vegas, NV 89145</p> <p>11 Cheryl L. O'Connor, Esq. (NBN 14645) 12 Ryan D. Ball, Esq. (Pro Hac Vice) 13 Jeremy S. Close, Esq. (Pro Hac Vice) 14 Richard J. Grabowski, Esq. (Pro Hac Vice) 15 JONES DAY 16 3161 Michelson Drive, Suite 800 17 Irvine, CA 92612.4408</p> <p>18 <i>Attorneys for Experian Information Solutions, 19 Inc.</i></p>	<p>5 <u>/s/ Miles N. Clark</u> 6 Matthew I. Knepper, Esq. (NBN 12796) 7 Miles N. Clark, Esq. (NBN 13848) 8 KNEPPER & CLARK LLC 9 10040 W. Cheyenne Ave., Suite 170-109 10 Las Vegas, NV 89129</p> <p>11 Sean N. Payne (NBN 13216) 12 PAYNE LAW FIRM LLC 13 9550 S. Eastern Ave. Suite 253-A213 14 Las Vegas, NV 89123</p> <p>15 David H. Krieger, Esq. (NBN 9086) 16 HAINES & KRIEGER, LLC 17 8985 S. Eastern Ave., Suite 350 18 Henderson, NV 89123</p>
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16 **ORDER**

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18 **IT IS SO ORDERED.**

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21 UNITED STATES DISTRICT JUDGE
22 Dated: November 27, 2018.