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7 *Attorneys for Defendant*
Experian Information Solutions, Inc.

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

11 JOHN E. ASHCRAFT
 12 Plaintiff,
 13 v.
 14 WELK RESORT GROUP, CORP;
 15 EXPERIAN INFORMATION SOLUTIONS,
 INC.,
 16 Defendants.

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

**EXPERIAN INFORMATION
 SOLUTIONS, INC.’S MOTION TO
 EXTEND TIME TO RESPOND TO
 MOTION TO REDACT PLAINTIFF’S
 EXHIBIT B TO MOTION TO STRIKE IN
 PART DEFENDANT EXPERIAN
 INFORMATION SOLUTIONS, INC.’S
 ERRATA SHEET TO ITS 30(B)(6)
 DEPOSITION (ECF NO. 33)**

(First Request)

Complaint filed: December 22, 2016

20 Defendant Experian Information Solutions, Inc. (“Experian”) respectfully requests a four
 21 (4) day extension of time to file its response to Plaintiff John E. Ashcraft’s Motion to Redact
 22 Plaintiff’s Exhibit B to Motion to Strike in Part Defendant Experian Information Solutions, Inc.’s
 23 Errata Sheet to its 30(b)(6) Deposition filed on July 10, 2017 (the “Motion to Redact”). The
 24 response to the Motion to Redact is due today, July 24, 2017. Experian requests an extension until
 25 Friday, July 28, 2017, to respond. Upon filing its briefs in opposition to Plaintiff’s Motion to
 26 Strike in Part Defendant Experian Information Solutions, Inc.’s Errata Sheet to its 30(b)(6)
 27 Deposition (ECF No. 31) and Plaintiff’s Re-Urged Motion for Leave to File First Amended

1 Complaint (ECF No. 30), Experian’s counsel realized that she inadvertently miscalendared the
2 response to Plaintiff’s Motion to Redact. Experian supports Plaintiff’s Motion to Redact and
3 intends on filing a response brief substantiating the need for redaction of confidential information.
4 With that response brief, Experian intends on submitting a declaration explaining why such
5 information is confidential.

6 **MEMORANDUM OF POINTS AND AUTHORITIES**

7 Pursuant to LR IA 6-1, a party may move for additional time to perform an act, and the
8 court may for good cause extend the time to perform an act when the request is made before the
9 original time has expired. Fed. R. Civ. P. 6(b)(1)(A).

10 Good cause exists to grant Experian’s motion. Plaintiff filed his Motion to Redact on July
11 10, 2017. Experian’s response was due on or before July 24, 2017. When filing Experian’s briefs
12 in opposition to Plaintiff’s Motion to Strike in Part Defendant Experian Information Solutions,
13 Inc.’s Errata Sheet to its 30(b)(6) Deposition (ECF No. 31) and Plaintiff’s Re-Urged Motion for
14 Leave to File First Amended Complaint (ECF No. 30), Experian’s counsel realized that she
15 inadvertently miscalendared the response to Plaintiff’s Motion to Redact. Experian intends on
16 filing a response to the Motion to Redact demonstrating why such confidential information should
17 remain redacted.

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1 Plaintiff will not be prejudiced as Plaintiff will still have seven (7) days to file a reply in
2 support of his Motion to Redact. Further, Experian only requests a four-day extension to respond.
3 Lastly, Experian has acted in good faith, immediately filing this motion upon realizing the error.
4 Experian respectfully requests the Court grant Experian's motion and provide an extension until
5 Friday, July 28, 2017.

6 DATED this 24th day of July 2017.

7 NAYLOR & BRASTER

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9 By: /s/ Jennifer L. Braster

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13 *Attorneys for Defendant Experian Information
Solutions, Inc.*

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18 IT IS SO ORDERED.
Dated: July 26, 2017

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United States Magistrate Judge