

Snell & Wilmer
LLP
LAW OFFICES
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, Nevada 89169
702.784.5200

1 Jeffrey Willis, Esq.
Nevada Bar No. 4797
2 Tanya N. Lewis, Esq.
Nevada Bar No. 8855
3 SNELL & WILMER L.L.P.
3883 Howard Hughes Parkway, Suite 1100
4 Las Vegas, NV 89169
Telephone: (702) 784-5200
5 Facsimile: (702) 784-5252
jwillis@swlaw.com
6 tlewis@swlaw.com

7 *Attorneys for Defendant*
Wells Fargo Bank, N.A.
8 *(incorrectly named as*
Wells Fargo Home Mortgage and
9 *Wells Fargo Financial*
Cards)

10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA

12 GEORGE C. PICHON,
13 Plaintiff,

Case No. 2:17-cv-00275-APG-GWF

14 vs.

15 WELLS FARGO HOME MORTGAGE;
16 WELLS FARGO FINANCIAL CARDS;
17 HSBC MORTGAGE SERVICES F/K/A
HFC/USCL; EQUIFAX INFORMATION
18 SERVICES, LLC.
Defendants.

**STIPULATION AND ORDER TO
EXTEND TIME FOR DEFENDANT
WELLS FARGO BANK, N.A.'S TIME
TO RESPOND TO PLAINTIFF'S
COMPLAINT**
FIRST REQUEST

19 It is hereby stipulated by and between Plaintiff Paul J. Couture (“Plaintiff”), through his
20 attorneys, Knepper & Clark, and Defendant Wells Fargo Bank, N.A (“Wells Fargo”), through its
21 attorneys, the law firm of Snell & Wilmer L.L.P., as follows:

22 Plaintiff filed his Complaint on January 30, 2017 [Docket No. 1]. Wells Fargo was served
23 on February 3, 2017, and its response is due on or about February 24, 2017. In the interest of
24 conserving client and judicial resources, Wells Fargo requests, and Plaintiff agrees, that Wells
25 Fargo shall have until **March 31, 2017**, to file its responsive pleading. This is the parties’ first
26 request for an extension of time to respond to the Complaint, and is not intended to cause any
27 delay or prejudice to any party, but is intended so that the parties may discuss settlement.
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated February 22, 2017

<p>KNEPPER & CLARK, LLC</p> <p>By: <u>/s/ Matt Knepper</u> Matthew I. Knepper, Esq. Miles N. Clark, Esq. KNEPPER & CLARK, LLC 10040 W. Cheyenne Ave., Ste 170-109 Las Vegas, NV 89129 <i>(signed with permission)</i></p> <p><i>Attorneys for Plaintiff George Pichon</i></p>	<p>SNELL & WILMER L.L.P.</p> <p>By: <u>/s/ Tanya N. Lewis</u> Jeffrey Willis (NV Bar No. 4797) Tanya N. Lewis (NV Bar No. 8855) 3883 Howard Hughes Parkway, Suite 1100 Las Vegas, NV 89169 Telephone: (702) 784-5200 Facsimile: (702) 784-5252</p> <p><i>Attorneys for Defendant Wells Fargo Bank, N.A. (incorrectly named as Wells Fargo Home Mortgage and Wells Fargo Financial Cards)</i></p>
---	--

Snell & Wilmer
LLP.
LAW OFFICES
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, Nevada 89169
702.784.5200

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

**IT IS ORDERED THAT Wells Fargo Bank, N.A.'s time to respond to Plaintiff's
Complaint shall be extended to on or before March 31, 2017.**

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED February 24, 2017.

Respectfully submitted by:

SNELL & WILMER L.L.P.

/s/ Tanya N. Lewis

Tanya N. Lewis, Esq.

3883 Howard Hughes Parkway, Suite 1100

Las Vegas, NV 89169

Telephone: (702) 784-5200

Attorneys for Wells Fargo Bank, N.A. (incorrectly named as

Wells Fargo Home Mortgage and Wells Fargo Financial Cards)

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I hereby declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing **STIPULATION AND ORDER TO EXTEND TIME FOR DEFENDANT WELLS FARGO BANK, N.A.’S TIME TO RESPOND TO PLAINTIFF’S COMPLAINT** by the method indicated below:

_____	U.S. Mail	_____	Federal Express
_____	U.S. Certified Mail	<u> X </u>	Electronic Service
_____	Facsimile Transmission	_____	Hand Delivery
_____	Overnight Mail		

and addressed to the following:

Matthew I. Knepper, Esq.
Miles N. Clark, Esq.
KNEPPER & CLARK, LLC
10040 W. Cheyenne Ave., Ste 170-109
Las Vegas, NV 89129
Email: matthew.knepper@knepperclark.com
Email: miles.clark@knepperclark.com

David H. Krieger, Esq.
HANES & KRIEGER, LLC
8985 S. Eastern Ave., Suite 350
Henderson, NV 89123
Email: dkrieger@hainesandkrieger.com

Attorneys for Plaintiff

DATED this 22nd day of February, 2017.

/s/ Debbie Withers
An Employee of Snell & Wilmer L.L.P.

25822561