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7 UNITED STATES DISTRICT COURT

8 STATE OF NEVADA

9 CHRISTOPHER HEGNER and  
10 LESLIE HEGNER,

11 Plaintiffs,

12 v.

13 AARGON COLLECTION AGENCY (aka  
14 AARGON AGENCY, INC.); and  
ATTORNEY ARMAND FRIED,

15 Defendants.

Case No.: 2:17-cv-00525-JAD-PAL

**STIPULATION AND ORDER TO  
EXTEND TIME FOR PLAINTIFF TO  
RESPOND TO MOTION TO DISMISS**

**(FIRST REQUEST)**

ECF No. 10

16  
17 All parties hereby stipulate and request that the court enter an order extending Plaintiffs'  
18 time to file their responsive pleading to Defendants' Motion to Dismiss the above-caption matter  
19 from March 30, 2017 to April 3, 2017. Good cause exists for this request.

20 Plaintiffs' counsel has filed 11 different lawsuits against the Defendants in this district over  
21 the past several months, and Defendants have filed a Motion to Dismiss in five of those lawsuits.  
22 The responses to the Motion to Dismiss on three out of the said five lawsuits, including the Plaintiffs'  
23 response to the Motion to Dismiss filed in the above-referenced caption are due between March 30,  
24 2017 and April 3, 2017.

25 Counsel for the Plaintiffs has been attending to his younger son who has been ill in the past  
26 few days, and therefore, counsel has been unable to attend to and respond to Defendants' Motion to  
27 Dismiss before the due date of March 30, 2017 in the above-referenced caption. In addition, new  
28 counsel for the Defendants has appeared, and are discussing alternatives and hope to stipulate to

1 some form of consolidation and/or relation of the case.

2 In this regard, the parties are in agreement that the deadline for Plaintiffs to file their  
3 Response to the Defendants' Motion to Dismiss in the above-captioned case shall be extended from  
4 March 30, 2016 to April 3, 2017.

5 The extension is requested by the Plaintiffs to allow their counsel sufficient time to review  
6 the Defendants' Motion to Dismiss, gather the necessary information to prepare a response on  
7 Plaintiffs' behalf and to respond to all of Defendants' Motion To Dismiss by April 3, 2017. This  
8 stipulation is not made for purposes of delay.

9 IT IS SO STIPULATED.

10 DATED this 30th day of March, 2017

DATED this 30th day of March, 2017

11 THE LAW OFFICE OF VERNON NELSON

LINCOLN GUSTAFSON & CERCOS, LLP

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13 By:       /s/ Vernon Nelson      

By:       /s/ Shannon G. Splaine      

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21 Attorney for Plaintiffs

Attorneys for Defendants, Aargon Agency, Inc.  
aka Aargon Collection Agency; Armand Fried

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**ORDER**

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IT IS SO ORDERED.

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Jennifer Dorsey, U.S. District Judge  
March 31, 2017

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