

1 Anthony L. Martin
2 Nevada Bar No. 8177
3 anthony.martin@ogletreedeakins.com
4 Erica J. Chee
5 Nevada Bar No. 12238
6 brian.bradford@ogletreedeakins.com
7 OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.
8 Wells Fargo Tower
Suite 1500
3800 Howard Hughes Parkway
Las Vegas, NV 89169
Telephone: 702.369.6800
Fax: 702.369.6888

9 Attorneys for Defendant Capital One Services II, LLC

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

12 THOMAS BIRGMANN, an individual,

13 Plaintiff,

14 vs.

15 CAPITAL ONE SERVICES, LLC, a foreign
16 limited-liability company; DOES 1 through 10
inclusive; ROES
17 CORPORATIONS/ENTITIES 1 through 10
inclusive,

18 Defendant(s).

19 Case No.: 2:17-cv-00717-JAD-CWH

20 **STIPULATION AND ORDER TO**
EXTEND DEADLINE FOR
DEFENDANT TO FILE RESPONSE TO
PLAINTIFF'S COMPLAINT

21 **[SECOND REQUEST]**

22 Plaintiff Thomas Birgmann ("Plaintiff") and Defendant Capital One Services II, LLC
(identified as Capital One Services, LLC in the Complaint) ("Defendant"), by and through undersigned
counsel, hereby stipulate to an one-week extension of time to respond to Plaintiff's Complaint (ECF
No. 1) filed on March 13, 2017. The response is currently due May 9, 2017.

23 The parties stipulate that Defendant has up to and including **May 15, 2017** in which to respond
24 to Plaintiff's Complaint. This is the second request for an extension of time to respond to the
25 Complaint. Defendant and its counsel require additional time to prepare and review an appropriate
26 response to the Complaint.
27
28 . . .

1 This request is sought in good faith and not for purposes of delay.

2 DATED this 8th day of May, 2017.

3 THE THATER LAW GROUP, P.C.

4

5 /s/ M. Lani Esteban-Trinidad

6 M. Lani Esteban-Trinidad
7 Nevada Bar No. 6967
8 6390 W. Cheyenne Avenue, Suite A
9 Las Vegas, NV 89108
10 Attorneys for Plaintiff

DATED this 8th day of May, 2017.

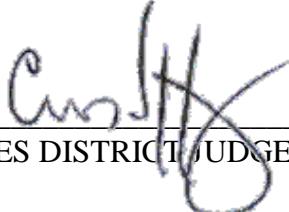
OGLETREE, DEAKINS, NASH, SMOAK
& STEWART, P.C.

/s/ Erica J. Chee

Anthony L. Martin
Nevada Bar No. 8177
Erica J. Chee
Nevada Bar No. 12238
Wells Fargo Tower
Suite 1500
3800 Howard Hughes Parkway
Las Vegas, NV 89169
Attorneys for Defendant

12 **ORDER**

13 IT IS SO ORDERED:

14
15 
16 UNITED STATES DISTRICT JUDGE

17 DATED: May 9, 2017

18
19
20
21
22
23
24
25
26
27
28