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 5 AMERICAN HONDA FINANCE CORPORATION

6
 7 **UNITED STATES DISTRICT COURT**
 8 **DISTRICT OF NEVADA**

9
 10 KAREN S. LAIRD,
 Plaintiff,
 11
 v.
 12 AMERICAN HONDA FINANCE CORP.;
 13 EQUIFAX INFORMATION SERVICES, LLC,
 14 Defendants.

Case No.: 2:17-CV-01383-JAD-NJK

**STIPULATION AND [PROPOSED] ORDER
 FOR EXTENSION OF TIME TO FILE
 RESPONSIVE PLEADING TO PLAINTIFF'S
 COMPLAINT
 (First Request)**

15
 16 Defendant, AMERICAN HONDA FINANCE CORPORATION (hereinafter "AHFC"), by
 17 and through its counsel of record, CHAD C. BUTTERFIELD, ESQ., of the law firm WILSON,
 18 ELSER, MOSKOWITZ, EDELMAN & DICKER LLP, and Plaintiff, GREGORY P.
 19 ROMBOLETTI, by and through his counsel of record, DAVID H. KRIEGER, ESQ. of the law firm
 20 HAINES & KRIEGER, LLC hereby stipulate and agree to extend the deadline for filing a
 21 responsive pleading to June 21, 2017.

22 This stipulation is submitted in compliance with LR IA 6-1. Good cause exists for the
 23 requested extension, as counsel for AHFC has only recently been retained to represent AHFC in
 24 this matter and has only recently obtained the relevant file materials and information necessary to
 25 respond to the allegations set forth in the Complaint. Accordingly, the parties agree that the
 26 requested extension furthers the interests of this litigation and is not being requested in bad faith or
 27 to delay these proceedings unnecessarily.
 28

1 This is the parties' first request for extension of the deadline. The parties' failure to file this
2 stipulation on or before June 7, 2017 (i.e., the original responsive pleading deadline) was the result
3 of a clerical error by counsel for AHFC's former legal assistant, who inadvertently failed to calendar
4 the deadline. Counsel for AHFC immediately contacted Plaintiff's counsel to request a stipulation
5 to extend the deadline upon realizing that the responsive pleading deadline had passed. Plaintiff's
6 counsel graciously agreed to the requested extension. Accordingly, the parties respectfully submit
7 that the failure to submit this stipulation on or before June 7, 2017 was the result of excusable
8 neglect.

9 DATED this 8th day of June, 2017.

**WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP**

/s/ Chad C. Butterfield

Chad C. Butterfield, Esq.
Nevada Bar No. 010532
300 South Fourth Street, 11th Floor
Las Vegas, NV 89101
Attorneys for Defendant Target Corporation

15 DATED this 8th day of June, 2017.

HAINES & KRIEGER, LLC

/s/ David H. Krieger

David H. Krieger, Esq.
Nevada Bar No. 9806
8985 S. Eastern Ave., Suite 350
Henderson, NV 89123
Attorney for Plaintiff Gregory Romboletti

ORDER

GOOD CAUSE SHOWN, IT IS SO ORDERED.

Dated this 9th __ day of ___ June ____, 2017.



UNITED STATES MAGISTRATE JUDGE