1 2 3 4 5 6 7 8 9	Richard J. Reynolds (SBN 11864) E-mail: rreynolds@bwslaw.com BURKE, WILLIAMS & SORENSEN, LLP 1851 East First Street, Suite 1550 Santa Ana, CA 92705-4067 Tel: 949.863.3363 Fax: 949.863.3350 Michael R. Brooks, Esq. Nevada Bar No. 7287 E-mail: mbrooks@klnevada.com KOLESAR & LEATHAM 400 S. Rampart Blvd., Suite 400 Las Vegas, NV 89145 Tel: 702.362.7800 Fax: 702.362.9472 Attorneys for Defendants TRINITY FINANCIAL SERVICES, LLC an TRINITY RECOVERY SERVICES, LLC	d		
11	UNITED STATES DISTRICT COURT			
12	DISTRICT OF NEVADA			
13				
14	RODNEY MOTT, and others similarly situated,	Case N	No. 2:17-cv-01754-RFB-GWF	
15	·		T MOTION AND ORDER TO	
16	Plaintiff,	AND I	CND DEADLINES FOR RESPONSE REPLY BRIEFS RE PLAINTIFF'S	
17	TRINITY EDIANGIAL GERMANDE LLC		ION FOR LEAVE TO FILE FIRST NDED COMPLAINT	
18	TRINITY FINANCIAL SERVICES, LLC, AND TRINITY RECOVERY SERVICES, LLC,			
19	Defendants.			
20	Detendants.			
21				
22	Plaintiff Rodney Mott ("Plaintiff") and Defendants Trinity Financial Services, LLC and			
23	Trinity Recovery Services, LLC (the "Trinity Defendants"), by and through their counsel of			
24	record (collectively the "Parties"), hereby request the Court to extend the response and reply			
25	briefing deadlines in connection with Plaintiff's Motion For Leave To File First Amended			
26	Complaint (Doc. No. 8). The Parties state that:			
27				
28	///			
BURKE, WILLIAMS & SORENSEN, LLP ATTORNEYS AT LAW SANTA ANA	IRV #4849-0159-3681 v1	- 1 -	JOINT MOTION AND ORDER TO EXTEND DEADLINES FOR RESPONSE AND REPLY BRIEFS RE PLAINTIFF'S MOTION FOR LEAVE	

1	1. On September 18, 2017, Plaintiff filed a Motion For Leave To File First			
2	Amended Complaint (Doc. No. 8).			
3	2. The Parties now stipulate and agree to extend the Trinity Defendants' deadline to			
4	file their Response to the Motion from October	file their Response to the Motion from October 2, 2017 to October 16, 2017.		
5	3. The Parties further stipulate and agree to extend Plaintiff's deadline to file his			
6	Reply in support of his Motion to October 30, 2017.			
7	4. The extensions will allow the Pa	The extensions will allow the Parties the time necessary to fully analyze and brief		
8	the issues found in the Motion and anticipated Response to the Motion.			
9	8. This is the Parties' first request for an extension of these deadlines.			
10	IT IS SO STIPLATED.			
11				
12	Dated: September 29, 2017	Dated: September 29, 2017		
13	KNEPPER & CLARK, LLP	BURKE, WILLIAMS & SORENSEN, LLP		
14	Dv. /a/ Milas Clank	Dry /o/ Distant I Down II		
15	By: /s/ Miles Clark Miles Clark	By: /s/ Richard J. Reynolds Richard J. Reynolds		
16	Matthew Knepper 10040 W. Cheyenne Ave., Suite 170-109	1851 East First Street, Suite 1550 Santa Ana, CA 92705-4067		
17	Las Vegas, NV 89129	Michael R. Brooks		
18	David H. Krieger HAINES & KRIEGER, LLC	KOLESAR & LEATHAM 400 S. Rampart Blvd., Suite 400		
19	8985 S. Eastern Ave., Suite 350 Henderson, NV 89123	Law Vegas, NV 89145		
20	Attorneys for Plaintiff	Attorneys for Defendants TRINITY FINANCIAL SERVICES, LLC		
21	Rodney Mott	and TRINITY RECOVERY SERVICES, LLC		
22	IT IS SO ORDERI	ED:		
23	II IS SO ORDERED:			
24				
25	RICHARD F. BOULWARE, II			
26	United States District Judge			
27	DATED this 4th day of	September, 201/.		

BURKE, WILLIAMS & SORENSEN, LLP ATTORNEYS AT LAW SANTA ANA

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JOINT MOTION AND ORDER TO EXTEND DEADLINES FOR RESPONSE AND REPLY BRIEFS RE PLAINTIFF'S MOTION FOR LEAVE

1	OR	DER	
2	IT IS SO ORDERED.	DEN	
3	TI IS SO STEELED.		
4		LIC DICTRICT/COL	IDT/
5		U.S. DISTRICT/COU MAGISTRATE JUD	
6		Dated:	, 2017
7	Respectfully submitted by:		
8	BURKE, WILLIAMS & SORENSEN, LLP		
9			
10	By: /s/ <i>Richard J. Reynolds</i> Richard J. Revnolds		
11	Richard J. Reynolds 1851 East First Street, Suite 1550 Santa Ana, CA 92705-4067		
12	Michael R. Brooks		
13	KOLESAR & LEATHAM 400 S. Rampart Blvd., Suite 400		
14	Law Vegas, NV 89145		
15	Attorneys for Defendants TRINITY FINANCIAL SERVICES, LLC		
16	and TRINITY RECOVERY SERVIĆES, LLC		
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BURKE, WILLIAMS & SORENSEN, LLP ATTORNEYS AT LAW SANTA ANA

IRV #4849-0159-3681 v1

JOINT MOTION AND ORDER TO EXTEND

BEADLINES FOR RESPONSE AND REPLY

BRIEFS RE PLAINTIFF'S MOTION FOR LEAVE

CERTIFICATE OF SERVICE

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Pursuant to L.R., Part II, 5-4, I certify that I am an employee of BURKE, WILLIAMS & SORENSEN, LLP, and that on October 2, 2017, I caused to be served a true copy of the JOINT MOTION AND ORDER TO EXTEND DEADLINES FOR RESPONSE AND REPLY BRIEFS RE PLAINTIFF'S MOTION FOR LEAVE TO FILE FIRST AMENDED COMPLAINT addressed to all parties and counsel as identified on the Court-generated Notice of Electronic Filing; all counsel being registered to receive CM/ECF Electronic Filing as follows:

- Matthew I. Knepper matthew.knepper@knepperclark.com, efiling@knepperclark.com
- Miles N. Clark miles.clark@knepperclark.com, efiling@knepperclark.com
- **David H. Krieger** dkrieger@hainesandkrieger.com, ghaines@hainesandkrieger.com, igotnotices@hainesandkrieger.com, rachel@hainesandkrieger.com
- Michael R Brooks mbrooks@klnevada.com
- Richard J. Reynolds rreynolds@bwslaw.com, fcabezas@bwslaw.com, psoeffner@bwslaw.com, rjr-nef@bwslaw.com, tmims@bwslaw.com

Barbara W. Jeong
Barbara W. Jeong

IRV #4842-4058-3755 v1