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 10 TRINITY FINANCIAL SERVICES, LLC and
 TRINITY RECOVERY SERVICES, LLC
 11

12 UNITED STATES DISTRICT COURT
 13 DISTRICT OF NEVADA

15 RODNEY MOTT,
 16 Plaintiff,
 17 v.
 18 TRINITY FINANCIAL SERVICES, LLC,
 AND TRINITY RECOVERY SERVICES,
 19 LLC,
 20 Defendants.

Case No. 2:17-cv-01754-RFB-GWF

**STIPULATION FOR EXTENSION OF
 TIME TO RESPOND TO PLAINTIFF’S
 MOTION FOR TERMINATING
 SANCTIONS AND MOTION FOR
 PARTIAL SUMMARY JUDGMENT;
 ORDER [PROPOSED] THEREON
 (FIRST REQUEST)**

22 On August 10, 2018, plaintiff Rodney Mott (“Plaintiff”) filed a motion for terminating
 23 sanctions and a motion for partial summary judgment. Currently, defendants Trinity Financial
 24 Services, LLC and Trinity Recovery Services, LLC (collectively, “Defendants”) must respond to
 25 Plaintiff’s motion for terminating sanctions on or before August 24, 2018 and to Plaintiff’s
 26 motion for partial summary judgment on or before August 31, 2018.

27 Pursuant to LR 6-1 and LR 7-2, Plaintiff and Defendants, by and through their respective
 28

1 counsel of record, hereby stipulate and request that this Court (1) extend to and including
2 September 7, 2018 the time by which Defendants must respond to Plaintiff's motion for
3 terminating sanctions and (2) extend to and including September 14, 2018 the time by which
4 Defendants must respond to Plaintiff's motion for partial summary judgment.

5 There is good cause for the requested extension. The parties are discussing a potential
6 settlement of this matter and believe that it would be in the interest of justice and more efficient to
7 devote their time during the upcoming weeks on efforts to settle this matter rather than expending
8 time and money preparing responses and replies to the pending motions.

9 **IT IS SO STIPULATED.**

10 Dated August 17, 2018

<p>11 /s/ <i>Miles N. Clark</i> Matthew I. Knepper, Esq. Nevada Bar No. 12796 Miles N. Clark, Esq. Nevada Bar No. 13848 KNEPPER & CLARK LLC Email: matthew.knepper@knepperclark.com Email: miles.clark@knepperclark.com</p> <p>16 David H. Krieger, Esq. Nevada Bar No. 9086 HAINES & KRIEGER, LLC Email: dkrieger@hainesandkrieger.com 18 <i>Counsel for Plaintiff</i></p>	<p>11 /s/ <i>Michael R. Brooks</i> Michael R. Brooks, Esq. Nevada Bar No. 7287 KOLESAR & LEATHAM 400 S. Rampart Boulevard, Suite 400 Las Vegas, NV 89145 Email: mbrooks@klnevada.com</p> <p>Richard J. Reynolds, Esq. BURKE, WILLIAMS & SORENSEN, LLP 1851 East First Street, Suite 1550 Santa Ana, CA 92705, CA 92705 Email: rreynolds@bwslaw.com <i>Counsel for Defendants</i> <i>Trinity Financial Services, LLC and Trinity</i> <i>Recovery Services, LLC</i></p>
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20 **ORDER**
21 **IT IS SO ORDERED.**

22 Dated: August 20, 2018



23 RICHARD F. BOULWARE, II
24 United States District Court