1 2 3 4 5 6 7 8 9	J Christopher Jorgensen Nevada Bar No. 5382 LEWIS ROCA ROTHGERBER CHRISTIE LLP 3993 Howard Hughes Parkway, Suite 600 Las Vegas, NV 89169 Phone: (702) 949-8200 Email: cjorgensen@lrrc.com Attorneys for Defendant Barclays Bank Delaware David H. Krieger, Esq. (SBN: 9086) HAINES & KRIEGER, LLC 8985 S. Eastern Avenue, Suite 350 Henderson, Nevada 89123 Phone: (702) 880-5554 dkrieger@hainesandkrieger.com Michael Kind, Esq. (SBN: 13903) KAZEROUNI LAW GROUP, APC			
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13	Attorneys for Plaintiff			
14	Virginia Sielaw			
15	UNITED STATES DISTRICT COURT			
16	DISTRICT OF NEVADA			
17	Virginia Sielaw,	Case No.: 2:17-cv-02045-	APG-NJK	
18	Plaintiff,	STIPULATION TO EXT DEFENDANT BARCLA		
19	vs.	DELAWARE'S TIME T AMENDED COMPLAIN	O RESPOND TO	
20	Ally Financial f/k/a GMAC Automotive Bank, Barclays Bank Delaware, Equifax	(FIRST REQUEST)		
21	Information Services LLC and Trans			
22	Union LLC, Defendants.	Compl. Filed: Amend. Comp. Filed:	July 27, 2017 August 28, 2017	
23	Defendants.	Hon. Judge Andrew P. Go Hon. Magistrate Judge Na	rdon nov I. Koppe	
24		11011. Magistrate sudge Ma	ncy J. Koppe	
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	STIPULATION TO EXTEND TIME TO RESPOND TO AMENDED COMPLAINT			

1	This Stipulation to Extend Time to Respond to Amended Complaint is made by and		
2	between Plaintiff Virginia Sielaw ("Plaintiff") and Defendant Barclays Bank Delaware		
3	("Barclays") through their respective counsel, in light of the following facts:		
4	<u>RECITALS</u>		
5	A.	Plaintiff filed the Complaint ("Complaint") against Barclays on or about July 27,	
6	2017.		
7	В.	Plaintiff filed the Amended Complaint ("Amended Complaint") against Barclays	
8	on or about August 28, 2017.		
9	C.	Barclays' current deadline to respond to the Amended Complaint is September	
10	11, 2017.		
11	D.	The parties agreed that Barclays' would have through September 18, 2017 to	
12	respond to the Amended Complaint in order to give Barclays time to investigate Plaintiff's		
13	claims and prepare a proper response, and for the parties to discuss a potential resolution of this		
14	matter.		
15	E.	There is good cause to grant this stipulation because Barclays requires additional	
16	time to investigate Plaintiff's claims and prepare a proper response, and the parties require		
17	additional time to consider a resolution of this matter.		
18	F.	Pursuant to Local Rule IA 6-2 and Local Rule 7.1, Plaintiff and Barclays	
19	respectfully request that the Court extend Barclays' time to respond to Plaintiff's Amended		
20	Complaint through September 18, 2017.		
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STIPULATION TO EXTEND TIME TO RESPOND TO AMENDED COMPLAINT

1	<u>STIPULATION</u>		
2	NOW, THEREFORE, Plaintiff and Barclays hereby stipulate and agree that Barclays		
3	has up to and including September 18, 2017, to file a response to Plaintiff's Amended		
4	Complaint.		
5	IT IS SO STIPULATED.		
6			
7	DATED: September 1, 2017 LEWIS ROCA ROTHGERBER CHRISTIE LLP		
8			
9	By: <u>/s/ J Christopher Jorgenson</u> J Christopher Jorgensen Attorneys for Defendant		
10	Attorneys for Defendant Barclays Bank Delaware		
11			
12	DATED: September 1, 2017 KAZEROUNI LAW GROUP, APC		
13			
14	By: <u>/s/ David H. Krieger</u> Michael Kind, Esq.		
15	Attorney for Plaintiff Virginia Sielaw		
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17	IT IS SO ORDERED		
18	Dated: September 6, 2017		
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20	UNITED STATES MAGISTRATE JUDGE		
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STIPULATION TO EXTEND TIME TO RESPOND TO AMENDED COMPLAINT