ALLICIA B. TOMOLO, ESQ. 1 SBN 12116 3080 South Durango Drive, Ste 207 2 Las Vegas, Nevada 89117 3 Telephone: (702) 946-8440 Fax: (702) 946-1035 4 abtomolo@gmail.com Attorney for Defendant 5 6 7 Michael Silver, 8 9 Plaintiff, 10 VS. 11 Cash Kingdom, LLC d/b/a Cash Kingdom 12 and Law Office of Sean P. Hillin, P.C. 13 Defendant. 14 15 16 17 18 19

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UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

Case No. 2:17-cv-02234

STIPULATION AND ORDER EXTENDING TIME FOR DEFENDANTS RESPONSE TO PLAINTIFF'S COMPLAINT

STIPULATION

Defendants, Cash Kingdom, LLC d/b/a Cash Kingdom and Law Office of Sean P. Hillin, P.C. ("Defendants"), by and through their respective counsel, hereby represent, and Plaintiff, Michael Silver ("Plaintiff") does not object, as follows:

- On August 22, 2017 Plaintiff filed a Complaint in the above entitled action ("Complaint").
- 2. Defendant Cash Kingdom LLC d/b/a Cash Kingdom was served with the Complaint on September 18, 2017.
- 3. Defendant Law Office of Sean P. Hillin, PC was served with the Complaint on September 18, 2017.
- 4. The Complaint was based on facts and allegations of an underlying debt collection action ("Collection Case") that was filed by Defendants against the Plaintiff in Las

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Vegas Justice Court and identified as Case No. 16C025066 filed on December 16, 2016.

- 5. Discovery was underway in the Collection Case and Defendants believed that it may likely assist in a resolution of the instant matter.
- 6. Defendant's counsel conferred with Plaintiff's counsel in the instant matter on October 5, 2017 regarding dates of service and an extension of time to file a responsive pleading, but, although counsel for Plaintiff requested, Defendant failed to confirm a date.
- 7. On January 12, 2018 Defendant's advised counsel that significant discovery had taken place in the Collection Case and that the parties would like to move toward a resolution in the instant matter, as Plaintiff had made an opening settlement demand to Defendants.
- 8. In an effort to attempt to resolve this action and to mitigate any further expenditure of time and costs, Plaintiff and Defendant have stipulated and agreed to extend the allowable time for Defendant to file a responsive pleading through January 19, 2018.
- 9. Defendants have requested the foregoing extension, and Plaintiff has agreed to that request.

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10. This is the first request for an extension of this deadline made by the parties. 1 **DATED** this 16th day of January 2018. 2 3 Allicia B. Tomolo, Esq. KAZEROUNI LAW GROUP, APC 4 By:/s/ Allicia B. Tomolo, Esq. By: /s/ Michael Kind, Esq. ALLICIA B. TOMOLO, ESQ. Michael Kind, Esq. 5 State Bar No: 265696 State Bar No: 13903 6 3080 South Durango Drive, Suite 207 6069 South Ft. Apache Road, #100 Las Vegas, NV 89117 Las Vegas, NV 89147 7 (702) 400-6808 x7 (702) 946-8440 (702) 946-1035 Fax mkind@kazlg 8 Attorneys for Plaintiff Attorney for Defendants Cash Kingdom, LLC d/b/a Cash Kingdom 10 and Law Office of Sean P. Hillin, P.C. 11 12 13 **ORDER** 14 15 IT IS SO ORDERED. 16 17 18 19 DATED: <u>January 18, 2018</u> 20 21 22 23 24 25 26

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