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10 **UNITED STATES DISTRICT COURT**
11 **FOR THE DISTRICT OF NEVADA**

12 CATHERINE NICHOLS,

13 Plaintiff,

14 v.

15 CREDIT UNION 1 and EXPERIAN
16 INFORMATION SOLUTIONS, INC.,

17 Defendants.

18 **Case No.:** 2:17-cv-02337-APG-GWF

19 **STIPULATION AND [PROPOSED]
20 ORDER FOR EXTENSION OF TIME
21 FOR DEFENDANT TO RESPOND TO
22 COMPLAINT
23 (FIRST REQUEST)**

24 Pursuant to Federal Rule of Civil Procedure 6(b) and Local Rules 6-2, 7-1, Plaintiff
25 Catherine Nichols and Defendant Credit Union 1, stipulate through their undersigned counsel that
26 Defendant's deadline to move, answer, or otherwise respond to the Complaint is extended from
27 January 10, 2018, through and including January 19, 2018. Plaintiff consents to the extension.

28 Good cause exists for the extension given that Defendant recently retained counsel, is still
29 investigating Plaintiff's allegations against it, and Plaintiff's counsel recently communicated a
30 settlement offer that is being evaluated. Defendant expects that by January 19, 2018, it will be in
31 a position to determine if the claim against it can be resolved or if it will be necessary for
32 Defendant to move, answer, or otherwise respond to the Complaint.

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1 It is further agreed that nothing in this stipulation shall be deemed to waive or prejudice
2 any claims or defenses of any party to this action.

3 DATED: January 9, 2018

FENNEMORE CRAIG, P.C.

5 By: /s/ Leslie Bryan Hart

6 Leslie Bryan Hart
7 Brandi M. Planet
8 300 E. Second Street, Suite 1510
9 Reno, Nevada 89501

Attorneys for Defendant Credit Union 1

10 DATED: January 9, 2018

KNEPPER & CLARK, LLC

12 By: /s/ Miles N. Clark

13 Miles N. Clark
14 Matthew I. Knepper
15 10040 W. Cheyenne Ave., Ste. 170-109
16 Las Vegas, Nevada 89129
17 *Attorneys for Plaintiff Catherine Nichols*

18 **IT IS SO ORDERED.**

19 
20 UNITED STATES MAGISTRATE JUDGE

21 DATED: 1/10/2018