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# UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

Keith H. Asbell,	Case No.: 2:17-cv-03122-JCM-PAL
Plaintiff, v.  Experian Information Solutions, Inc. and Trans Union LLC,  Defendants.	Stipulation for an extension of time for Plaintiff to Respond to Trans Union LLC's Motion to Dismiss [ECF No. 16]  (First Request)

Plaintiff Keith H. Asbell ("Plaintiff") and Trans Union LLC ("Defendant"), by and through their respective counsel, hereby submit this stipulation for an extension of time—until **April 12, 2018**—for Plaintiff to respond to Defendant's Motion to Dismiss Plaintiff's First Amended Complaint, filed on March 15, 2018, ECF No. 16. Plaintiff's Response is currently due on March 29, 2018.

Plaintiff filed his Complaint on December 27, 2017. ECF No. 1. Defendant filed its motion to dismiss on February 15, 2018. ECF No. 11. On March 1, 2018, Plaintiff filed his First Amended Complaint. ECF No. 15. On March 15, 2018, Defendant filed its pending Motion to Dismiss Plaintiff's Amended Complaint. ECF No. 16. Plaintiff's Response is due on March 29, 2018. *Id.* The Parties are actively discussing resolution of the case and, in good faith and not for the purposes of delay, Plaintiff has requested and Defendant has agreed to allow Plaintiff an additional 14 days to respond to the Motion. The Parties in good faith stipulate to allow additional time for Plaintiff to respond to the Motion. This is the first request for an extension of this deadline.

The Parties therefore stipulate that Plaintiff's response to Defendant's motion to dismiss, ECF. No. 16, shall be due on or before **April 12, 2018**.

DATED this 29th day of March 2018.

## KAZEROUNI LAW GROUP, APC

By: /s/ Michael Kind Michael Kind, Esq. 6069 South Fort Apache Road, Suite 100 Las Vegas, Nevada 89148 Attorneys for Plaintiff

#### LEWIS BRISBOIS BISGAARD & SMITH LLP

By: <u>/s/ Jason Revzin</u>
Jason Revzin, Esq,
6385 S. Rainbow Blvd., Suite 600
Las Vegas, NV 89118
Attorneys for Defendant Trans Union LLC

IT IS SO ORDERED:

UNITED STATES DISTRICT JUDGE

Xellus C. Mahan

March 29, 2018 DATED: 1 2

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#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY pursuant to Rule 5 of the Federal Rules of Civil Procedure that on March 29, 2018, the foregoing Stipulation was served via CM/ ECF to all parties appearing in this case.

### KAZEROUNI LAW GROUP, APC

By: <u>/s/ Michael Kind</u>
Michael Kind
6069 South Fort Apache Road, Suite 100
Las Vegas, Nevada 89148

KAZEROUNI LAW GROUP, APC 6069 South Fort Apache Road, Suite 100 Las Vegas, Nevada 89148

STIPULATION

Case No.: 2:17-cv-03122-JCM-PAL