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14 **UNITED STATES DISTRICT COURT**
15 **DISTRICT OF NEVADA**

<p>16 Keith H. Asbell,</p> <p>17 18 Plaintiff,</p> <p>19 v.</p> <p>20 Experian Information Solutions, 21 Inc. and Trans Union LLC,</p> <p>22 23 Defendants.</p>	<p>Case No.: 2:17-cv-03122-JCM-PAL</p> <p>Stipulation for an extension of time for Plaintiff to Respond to Trans Union LLC's Motion to Dismiss [ECF No. 16]</p> <p>(Second Request)</p>
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24 Plaintiff Keith H. Asbell (“Plaintiff”) and Trans Union LLC (“Defendant”),
25 by and through their respective counsel, hereby submit this stipulation for an
26 extension of time—until **April 26, 2018**—for Plaintiff to respond to Defendant’s
27 Motion to Dismiss Plaintiff’s First Amended Complaint, filed on March 15, 2018,
28 ECF No. 16. Plaintiff’s Response is currently due on April 12, 2018.

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

11 The Parties therefore stipulate that Plaintiff's response to Defendant's motion
12 to dismiss, ECF. No. 16, shall be due on or before **April 26, 2018**.

13 DATED this 12th day of April 2018.

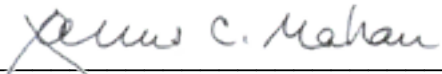
14 **KAZEROUNI LAW GROUP, APC**

15 By: /s/ Michael Kind
16 Michael Kind, Esq.
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19 **LEWIS BRISBOIS BISGAARD & SMITH LLP**

20 By: /s/ Jason Revzin
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Attorneys for Defendant Trans Union LLC

24 IT IS SO ORDERED:

25 
26 _____
27 UNITED STATES DISTRICT JUDGE

28 DATED: April 12, 2018

CERTIFICATE OF SERVICE

I HEREBY CERTIFY pursuant to Rule 5 of the Federal Rules of Civil Procedure that on April 12, 2018, the foregoing Stipulation was served via CM/ECF to all parties appearing in this case.

KAZEROUNI LAW GROUP, APC

By: /s/ Michael Kind
Michael Kind
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