

MORRIS LAW GROUP

411 E. BONNEVILLE AVE., SUITE 360, LAS VEGAS, NEVADA 89101
702/474-9400 · FAX 702/474-9422

1 Raleigh C. Thompson, NV Bar No. 11296
2 Ryan M. Lower, NV Bar No. 9108
3 MORRIS LAW GROUP
4 411 E. Bonneville Ave., Suite 360
5 Las Vegas, Nevada 89101
6 Telephone: (702) 474-9400
7 rct@morrislawgroup.com
8 rml@morrislawgroup.com

9 Attorneys for Defendant
10 Professional Credit Services, Inc.

11 UNITED STATES DISTRICT COURT
12 DISTRICT OF NEVADA

13 MOHARRAM JAFARIAN,) Case No. 2:17-cv-03132-APG-CWH
14 Plaintiff,)
15 v.) **STIPULATION AND ORDER TO**
16) **EXTEND TIME TO RESPOND TO**
17) **COMPLAINT**
18) **(SECOND REQUEST)**
19)
20)
21)
22)
23)
24)
25)
26)
27)
28)
Defendants.

21 Pursuant to Local Rules IA 6-1(a), 6-2 and 7-1, and Federal Rule
22 of Civil Procedure 6(b), defendant Professional Credit Services
23 ("Defendant") and plaintiff Moharram Jafarian ("Plaintiff"), by and through
24 their respective counsel of record, hereby stipulate as follows:

25 The parties have agreed to a second extension of the time for
26 Defendant to respond to Plaintiff's Complaint (ECF No. 1, filed on
27 December 29, 2017) from February 15, 2018 to March 1, 2018.

28 ...

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Rule 6(b) requires the Court to approve an extension of time for Defendant to respond to a Complaint, and therefore the Parties collectively request the Court approve the agreement, as set forth below:

a. This is the Parties' second stipulation for an enlargement of time to respond to the Complaint;

b. The Parties stipulate and agree that the deadline for Defendant to file an answer or otherwise respond to Plaintiff's Complaint shall be extended to on or before March 1, 2018; and

c. The parties request this extension to give their counsel additional time to further their discussions and assessment of Plaintiff's claims before Defendant is required to respond to the Complaint. This stipulation is not made for purposes of delay.

By /s/ Raleigh C. Thompson
Raleigh C. Thompson, (11296)
Ryan M. Lower, NV Bar 9108
MORRIS LAW GROUP
411 E. Bonneville Ave., Suite 360
Las Vegas, NV 89101

Attorneys for Defendant
Professional Credit Services, Inc.

By /s/ Miles N. Clark
Matthew I. Knepper, NV Bar 12796
Miles N. Clark, NV Bar 13848
KNEPPER & CLARK LLC
10040 W. Cheyenne Ave. #170-109
Las Vegas, NV 89129

David H. Krieger (9086)
HAINES & KRIEGER, LLC
8985 S. Eastern Ave., Suite 350
Henderson, NV 89123

Attorneys for Plaintiff
Moharram Jafarian

ORDER

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE
DATED February 14, 2018