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8 Attorneys for Defendant,  
 9 CONVERGENT OUTSOURCING, INC.

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

12 ROBERT REED,  
 13  
 14 Plaintiff,  
 15 vs.  
 16 CONVERGENT OUTSOURCING, Inc. and  
 17 COMCAST ENTERPRISE SERVICES,  
 18 LLC.,  
 19 Defendants.

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Case No.: 2:18-cv-00146-JAD-CWH

**STIPULATION TO EXTEND DEFENDANT  
 CONVERGENT OUTSOURCING, INC.'S  
 TIME TO RESPOND TO COMPLAINT**

**(First Request)**

22 Defendant, CONVERGENT OUTSOURCING, INC. (hereinafter "Convergent") and Plaintiff,  
 23 ROBERT REED (hereinafter "Plaintiff" collectively, the "Parties") stipulate and agree as follows:

24 Convergent's time to respond to Plaintiff's Complaint (ECF No. 1), filed on January 26, 2018,  
 25 will be extended from February 20, 2018 to March 22, 2018.

26 Convergent requires additional time to investigate Plaintiff's allegations and respond to Plaintiff's  
 27 Complaint. Counsel for Convergent only just received notice of this matter on February 22, 2018, and thus,

{N0397445;1}

1 is filing this Stipulation two (2) days after the initial deadline to respond to the Complaint. This is  
2 Convergent's first request for an extension.

3 DATED this 27th day of February, 2018.

4 **THE LAW OFFICE OF VERNON NELSON**

5 /s/ Melissa Ingleby, Esq.

6 By: \_\_\_\_\_

7 VERNON NELSON, ESQ.  
8 Nevada Bar No. 6434  
9 MELISSA INGLEBY, ESQ.  
10 Nevada Bar No. 12935  
11 9480 S. Eastern Avenue, Suite 252  
12 Las Vegas, NV 89123  
13 Attorneys for Plaintiff,  
14 ROBERT REED

15 **SPRINGEL & FINK LLP**

16 /s/ Nakesha S. Duncan, Esq.

17 By: \_\_\_\_\_

18 LEONARD T. FINK, ESQ.  
19 Nevada Bar No. 6296  
20 NAKESHA S. DUNCAN, ESQ.  
21 Nevada Bar No. 11556  
22 10655 Park Run Drive, Suite 275  
23 Las Vegas, Nevada 89144  
24 Attorneys for Defendant,  
25 CONVERGENT OUTSOURCING, INC.

26 IT IS SO ORDERED.

27 DATED: February 28, 2018

28 \_\_\_\_\_  
C.W. HOFFMAN, JR.  
UNITED STATES MAGISTRATE JUDGE

{N0397445;1}

1  
2 **CERTIFICATE OF SERVICE**  
3 **Reed v. Convergent Outsourcing, Inc.**  
4 **United States District Court Case No. 2:18-cv-00146-JAD-CWH**

5 STATE OF NEVADA )  
6 )  
7 COUNTY OF CLARK ) ss.

8 I, Julianna K. Ferguson, declare:

9 I am a resident of and employed in Clark County, Nevada. I am over the age of eighteen years  
10 and not a party to the within action. My business address is 10655 Park Run Drive, Suite 275, Las  
11 Vegas, Nevada, 89144.

12 On **February 27, 2018**, I served the document described as **STIPULATION TO EXTEND**  
13 **DEFENDANT CONVERGENT OUTSOURCING, INC.’S TIME TO RESPOND TO**  
14 **COMPLAINT** on the following parties:

15  
16 VERNON NELSON, ESQ.  
17 Nevada Bar No. 6434  
18 MELISSA INGLEBY, ESQ.  
19 Nevada Bar No. 12935  
20 9480 S. Eastern Avenue, Suite 252  
21 Las Vegas, NV 89123  
22 Tel: 702-476-2500  
23 Fax: 702-476-2788  
24 Attorneys for Plaintiff

25  
26 \_\_\_\_\_ VIA U.S. MAIL: by placing a true copy thereof enclosed in a sealed envelope with postage  
27 thereon fully prepaid, in the United States mail at Las Vegas Nevada. I am “readily familiar”  
28 with the firm’s practice of collection and processing correspondence by mailing. Under that  
practice, it would be deposited with the U.S. postal service on that same day with postage fully  
prepaid at Las Vegas, Nevada in the ordinary course of business

19  
20 \_\_\_\_\_ VIA FACSIMILE: by transmitting to a facsimile machine maintained by the person on whom it  
21 is served at the facsimile machine telephone number at last given by that person on any document  
22 which he/she has filed in the cause and served on the party making the service. The copy of the  
document served by facsimile transmission bears a notation of the date and place of transmission  
and the facsimile telephone number to which transmitted. A confirmation of the transmission  
containing the facsimile telephone numbers to which the document(s) was/were transmitted will  
be maintained with the document(s) served.

23 X VIA ELECTRONIC SERVICE: by submitting the foregoing to the Court’s E-filing System for  
24 Electronic Service upon the Court’s Service List pursuant to FRCP 5. The copy of the document  
25 electronically served bears a notation of the date and time of service. The original document will  
26 be maintained with the document(s) served and be made available, upon reasonable notice, for  
27 inspection by counsel or the Court.

28 I declare under penalty of perjury that the foregoing is true and correct.

/s/ Julianna K. Ferguson

{N0397445;1}

- 3 - \_\_\_\_\_  
An Employee of Springel & Fink LLP

**STIPULATION TO EXTEND DEFENDANT CONVERGENT OUTSOURCING, INC.’S TIME TO RESPOND  
TO COMPLAINT**