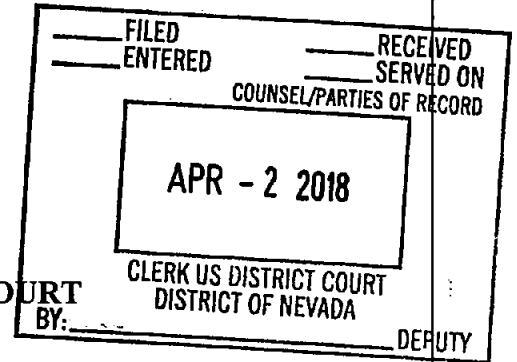


1 Michelle Bertsch  
2 4030 Deerfield Avenue  
3 Las Vegas, Nevada 89147  
4 702-371-8288  
5 In Proper Person

6 UNITED STATES DISTRICT COURT  
7 DISTRICT OF NEVADA



7 MICHELLE BERTSCH,  
8 Plaintiffs,

9 vs.

Case No.: 2:18-CV-00290-GMN-GWF

10 DISCOVER FINANCIAL SERVICES, CHASE BANK,  
11 SEARS CITIBANK DBA CBNA, US BANCORP,  
12 BANK OF AMERICA, N.A., SYNCHRONY  
13 FINANCIAL, AND ROES I THROUGH X,  
14 INCLUSIVE,  
15 Defendants.

16 **PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S**  
17 **MOTION TO DISMISS**

18 COMES NOW, Plaintiff, Michelle Bertsch, in proper person, and hereby moves the  
19 Court, pursuant to Rule 6 of the Federal Rules of Civil Procedure, for an extension of time for  
20 Plaintiff to oppose the Motion to Dismiss for Bank of America, Chase, and US Bank. In support  
21 of this motion, Plaintiff states as follows:

- 22 1. Plaintiff filed the Complaint on February 15, 2018. Defendants, Bank of America,  
23 Chase, US Bank have filed a motion to dismiss, which was due on March 30, 2018, the  
24 time to respond expired during the weekend period.
- 25 2. Plaintiff is currently putting together the opposition and needs additional time to conduct  
26 the investigation and respond appropriately.  
27

1 3. Plaintiff attempted to contact Defendant to request her consent to this extension. To date,  
2 no return call has been made. Therefore, Plaintiff requests a thirty (30) day extension to  
3 respond to the Motions to Dismiss, through April 30, 2018.  
4

5 4. This motion is not made for the purpose of delay, and it will not prejudice the parties.  
6 The relief requested will not affect any other litigations deadlines in this case.

7 MEMORANDUM

8 Rules 6(b) of the Federal Rules of Civil Procedure provides that the Court may grant the  
9 extensions of time at any time in its discretion for good cause shown. Where, as her, the request  
10 for extension is made on the day of expiration, next business day, no finding of excusable neglect  
11 is required. Plaintiff respectfully submits this good cause has been shown above for an extension  
12 of time.  
13

14 WHEREFORE, for the foregoing reasons and authorities, Plaintiff respectfully requests  
15 that the Court grant this motion and extend Plaintiff's deadline to respond to Defendant's Motion  
16 to Dismiss in this case until April 30, 2018. A proposed order is attached hereto as Exhibit A.  
17

18 Dated this 2<sup>nd</sup> day of April 2018.

19 

20 Michelle Bertsch  
21 4030 Deerfield Avenue  
22 Las Vegas, Nevada 89147  
23 702-371-8288  
24 In Proper Person

**CERTIFICATE OF MAILING**

I HEREBY CERTIFY that service of the Motion for Extension of Time to Respond to  
Opposition to Motion to Dismiss was made this 2 day of April 2018, by depositing a copy of  
the same in the U.S. Mail, postage prepaid, regular mail, addressed to:

Darren T. Brenner, Esq.  
1635 Village Center Circle, Ste. 200  
Las Vegas, Nevada 89134

Lindsay C. Demaree, Esq.  
1980 Festival Plaza Drive, Ste. 900  
Las Vegas, Nevada 89135

Rex Garner, Esq.  
1635 Village Center Circle, Ste. 200  
Las Vegas, Nevada 89134

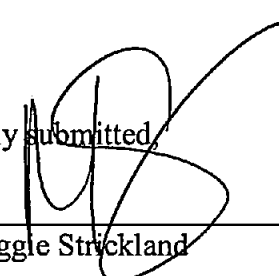
Tyson E. Hafen, Esq.  
100 North City Parkway, Ste. 1560  
Las Vegas, Nevada 89160

Joel Edward Tasca, Esq.  
1980 Festival Plaza Drive, Ste. 900  
Las Vegas, Nevada 89135

DATED this 2 day of 4, 2018.

Respectfully submitted,

By:

  
Maggie Strickland

1 Michelle Bertsch  
2 4030 Deerfield Avenue  
3 Las Vegas, Nevada 89147  
4 702-371-8288  
5 In Proper Person

6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8 MICHELLE BERTSCH,

9 Plaintiffs,

10 vs.

Case No.: 2:18-CV-00290-GMN-GWF

11 DISCOVER FINANCIAL SERVICES, CHASE BANK,  
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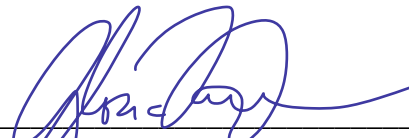
16 Defendants.

17 **ORDER GRANTING PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO RESPOND**  
18 **TO MOTION TO DISMISS**

19 THIS MATTER coming before the above-signed United States District Court for the  
20 District of Nevada upon Plaintiff's Motion for Extension of Time to Respond to Motion to  
21 Dismiss (herein, the "Motion") and the Court finding good cause that such Motion should be  
22 granted.

23 IT IS HEREBY ORDERED that the response date for Plaintiff to respond to the Motion  
24 to Dismiss by Bank of America, US Bank, and Chase is hereby extended to an including April 30,  
25 2018.

26 DATED this 17 day of April, 2018.

27   
28 Gloria M. Navarro, Chief Judge  
United States District Court