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 8 **UNITED STATES DISTRICT COURT**  
 9 **DISTRICT OF NEVADA**

10 Case No. 2:18-cv-00743-RFB-CWH

11 THOMAS A. O'CONNELL,  
 Plaintiff,

12 v.

13 AMERICAN EXPRESS COMPANY;  
 14 BANK OF AMERICA; JPMORGAN  
 CHASE BANK, NA; FRANKLIN  
 15 CAPITAL CORPORATION;  
 SHELL/CBNA; SYNCRB/CHEVRON;  
 16 WELLS FARGO/DILLARDS; and  
 EQUIFAX INFORMATION  
 17 SERVICES, LLC,

18 Defendants

**JOINT STIPULATION EXTENDING TIME  
 FOR DEFENDANT SYNCHRONY BANK TO  
 FILE AND SERVE A RESPONSE TO  
 PLAINTIFF'S COMPLAINT; [PROPOSED]  
 ORDER**

Assigned to: Judge Richard Franklin Boulware II  
 Referred to: Magistrate Judge Carl W. Hoffman

Compl. Filed: April 24, 2018

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20 **JOINT STIPULATION**

21 Plaintiff Thomas A. O'Connell ("Plaintiff") and Defendant Synchrony Bank ("Synchrony")  
 22 (together, the "Stipulating Parties") hereby stipulate and agree, by and through their attorneys of  
 23 record, as set forth below:

24 WHEREAS, Plaintiff filed a Complaint on April 24, 2018;

25 WHEREAS, Synchrony received the Complaint on May 8, 2018;

26 WHEREBY, Synchrony requested and Plaintiff agreed to extend Synchrony's time to file  
 27 and serve a response to Plaintiff's Complaint to June 26, 2018;

REED SMITH LLP  
 A limited liability partnership formed in the State of Delaware

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For the foregoing reasons, the Parties request this Court grant their Joint Stipulation extending Synchrony's time to file and serve a response to Plaintiff's Complaint to June 26, 2018.

**IT IS SO STIPULATED.**

DATED: May 25, 2018

HAINES & KRIEGER, LLC

By: /s/ Rachel B. Saturn

Rachel B. Saturn

Attorney for Plaintiff

DATED: May 25, 2018

WEINSTEIN & RILEY, P.S.

By: /s/ Aaron M. Waite

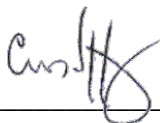
Aaron M. Waite

Attorney for Defendant Synchrony  
Bank

**[PROPOSED] ORDER**

**IT IS SO ORDERED.**

DATED: May 29, 2018

  
United States District Judge  
United States Magistrate Judge