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 15 *Attorneys for Plaintiff Thomas A. O'Connell*

16 **UNITED STATES DISTRICT COURT**
 17 **DISTRICT OF NEVADA**

<p>18 Thomas A. O'Connell, 19 Plaintiff, 20 v. 21 American Express Company, 22 Bank of America, JPMorgan 23 Chase Bank, NA, Franklin Capital 24 Corporation, Shell/CBNA,</p>	<p>25 Case No.: 2:18-cv-00743-RFB-CWH 26 Stipulation for an extension of time for Plaintiff to Respond to Defendant's Motion to Dismiss [ECF No. 27] 27 (Second Request)</p>
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28 Plaintiff Thomas A. O'Connell ("Plaintiff") and Bank of America ("Defendant"), by and through their respective counsel, hereby submit this stipulation for an extension of time—until **August 1, 2018**—for Plaintiff to respond to Defendant's Motion to Dismiss Plaintiff's Complaint, filed on June 20, 2018, ECF No. 27. Plaintiff's Response is currently due on July 18, 2018.

1 In good faith and not for the purposes of delay, Plaintiff requested the
2 extension to allow additional time for the parties to discuss resolution, since
3 settlement discussions are still ongoing. Plaintiff is also considering requesting
4 leave to amend the Complaint instead of opposing Defendant's motion. The Parties
5 in good faith stipulate to allow additional time for Plaintiff to respond to the
6 Motion. This is the second request for an extension of this deadline.

7 The Parties therefore stipulate that Plaintiff's response to Defendant's motion
8 to dismiss, ECF. No. 27, shall be due on or before **August 1, 2018**.

9 DATED this 13th day of July 2018.

10 **KAZEROUNI LAW GROUP, APC**

11 By: /s/ Michael Kind
12 Michael Kind, Esq.
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15 **Akerman LLP**

16 By: /s/ Rex Garner
17 Rex Garner, Esq.
18 1635 Village Center Circle, Suite 200
19 Las Vegas, NV 89134
Attorneys for Defendant

20 IT IS SO ORDERED:

21 

22 _____
23 RICHARD F. BOULWARE, II
24 United States District Court

25 DATED: July 16, 2018.

1 **CERTIFICATE OF SERVICE**

2 I HEREBY CERTIFY pursuant to Rule 5 of the Federal Rules of Civil
3 Procedure that on July 13, 2018, the foregoing Stipulation was served via CM/ECF
4 to all parties appearing in this case.
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6 **KAZEROUNI LAW GROUP, APC**

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