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 14 WALMART INC.

15 UNITED STATES DISTRICT COURT
 16 DISTRICT OF NEVADA

18 KORTNEY OLSON,
 19 Plaintiff,
 20 v.
 21 WALMART STORES INC. AND
 WONDER NATION,
 22 Defendants.

Case No. 2:20-cv-00152-GMN-NJK

**UNOPPOSED MOTION TO
 EXTEND TIME TO RESPOND TO
 INITIAL COMPLAINT**

(First Request)

Complaint served: February 7, 2020
 Current response date: February 28, 2020
 New response date: March 30, 2020

Judge: Gloria M. Navarro
 Magistrate Judge: Nancy J. Koppe

26 According to Local Rule IA 6-1 of the United States District Court for the
 27 District of Nevada, Walmart Inc., owner of the subsidiary that owns the trademark
 28 Wonder Nation (“Defendant”), with Plaintiff’s consent, respectively requests that

1 the Court extend Defendant's time to respond to Plaintiff's Complaint. This is
2 Defendant's first request.

3 **MEMORANDUM OF POINTS AND AUTHORITIES**

4 On January 22, 2020, Plaintiff filed a Complaint with the United States
5 District Court for the District of Nevada. On February 7, 2020, Plaintiff caused
6 copies of the Summons and Complaint to be delivered and served on Defendant.
7 Defendant has until February 28, 2020 to answer, move to dismiss or strike, or
8 otherwise respond to Plaintiff's Complaint.

9 Plaintiff, who originally filed her complaint pro se, has now retained counsel
10 and has granted Defendant a 30-day extension of time from its original response
11 date, pursuant to which Defendant shall have until March 30, 2020 to answer, move
12 to dismiss or strike, or otherwise respond to Plaintiff's Complaint. Plaintiff's
13 counsel is not yet admitted in Nevada, nor has he retained the services of local
14 counsel in this jurisdiction.

15 Plaintiff's retention of counsel and the parties' interests in resolving this
16 dispute serves as just cause for the filing of this request. Defendant reserves the
17 right to file an answer, motion or dismiss or strike, or other responsive pleading
18 prior to its March 30, 2020 deadline.

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Therefore, Defendant respectfully moves this Court for an extension until and including **March 30, 2020** to answer, move to dismiss or strike, or otherwise respond to the Complaint filed in this matter.

Dated: February 28, 2020

**ROPERS MAJESKI KOHN &
BENTLEY PC AND ARENT FOX LLP**

By: /s/ Timothy J. Lepore

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WALMART INC.

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CERTIFICATE OF SERVICE

In accordance with Rule 5(b) of the Federal Rules of Civil Procedure, and Local Rule IC 4-1(d), I hereby certify that on February 28, 2020, a copy of **UNOPPOSED MOTION TO EXTEND TIME TO RESPOND TO INITIAL COMPLAINT**, was served on all CM/ECF registered parties by filing and serving the same using the CM/ECF filing system.

/s/ Timothy J. Lepore

An employee of Ropers Majeski Kohn
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WALMART INC.

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15 UNITED STATES DISTRICT COURT
16 DISTRICT OF NEVADA
17

18 KORTNEY OLSON,
19 Plaintiff,
20 v.
21 WALMART STORES INC. AND
WONDER NATION,
22 Defendants.
23

Case No. 2:20-cv-00152-GMN-NJK

**ORDER TO EXTEND TIME TO
RESPOND TO INITIAL
COMPLAINT**

Complaint served: February 7, 2020
Current response date: February 28, 2020
New response date: March 30, 2020

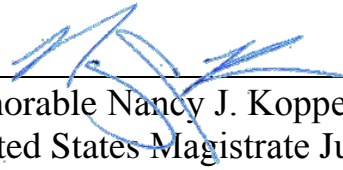
Judge: Gloria M. Navarro
Magistrate Judge: Nancy J. Koppe

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25 The Court, having reviewed Walmart Inc. (“Defendant”)’s Unopposed
26 Motion to Extend Time to Respond to Plaintiff Kortney Olson’s Initial Complaint,
27 and finding that just cause exists to extend Defendant’s deadline to answer or
28 otherwise respond to the Complaint, hereby orders as follows:

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Defendant shall have to, and including, March 30, 2020 to answer or otherwise respond to the Complaint.

IT IS SO ORDERED.



Honorable Nancy J. Koppe
United States Magistrate Judge

Dated: March 2, 2020