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*Attorneys for Defendants,
Madison Management Services, PLLC
Waldman & Porras, PLLC*

IN UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA
LAS VEGAS DIVISION

LISA A. BRYANT,

Plaintiff,

vs.

MADISON MANAGEMENT SERVICES,
LLC AND WALDMAN & PORRAS,
PLLC,

Defendant.

Civil Action No. 2:20-cv-00594-JAD-EJY

DEFENDANTS' NOTICE OF CORRECTED
FILING REGARDING DEFENDANTS'
MOTION FOR EXTENSION OF TIME FOR
DEFENDANTS MADISON MANAGEMENT
SERVICES , LLC AND WALDMAN &
PORRAS, PLLC'S TO FILE AN ANSWER
TO PLAINTIFF'S FIRST AMENDED
COMPLAINT

TO THE HONORABLE JUDGE OF SAID COURT:

DEFENDANTS MADISON MANAGEMENT SERVICES , LLC AND WALDMAN & PORRAS, PLLC. ("Defendants"), hereby respectfully notifies this Court that in filing yesterday afternoon their Motion for Extension of Time to Respond to Plaintiff's First Amended Complaint, Defendants' inadvertently uploaded an unrevised version of the motion. The motion had conflicts in the "conferred" section of the first paragraph, we were unable to make contact. It also had a conflict of the time requested to respond requesting 14 days in the first paragraph

and 15 days in the closing and the inadvertent omission of a signature by the undersigned. The corrected motion is attached to this Notice of Corrected Filing.

Defendants therefore respectfully ask this Court to accept the Notice of Corrected filing and the attached Motion.

Dated: December 3, 2020

Respectfully Submitted,

By: Nicholas M. Porras

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CERTIFICATE OF SERVICE

Pursuant to Rule 5 of the Federal Rules of Civil Procedure, the undersigned counsel for the Defendant certifies that the foregoing document has been filed with the Court and served upon all known counsel of record via the Court's electronic case filing system and by first class mail, on December 3, 2020.

/s/ Nicholas M. Porras
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MADISON MANAGEMENT SERVICES,
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MOTION FOR EXTENSION OF TIME FOR
DEFENDANTS MADISON MANAGEMENT
SERVICES , LLC AND WALDMAN &
PORRAS, PLLC'S TO FILE AN ANSWER
TO PLAINTIFF'S FIRST AMENDED
COMPLAINT

TO THE HONORABLE JUDGE OF SAID COURT:

DEFENDANTS MADISON MANAGEMENT SERVICES , LLC AND WALDMAN &
PORRAS, PLLC. ("Defendants"), hereby respectfully request an extension of time of fifteen
(15) days for Defendant to respond to Plaintiff's First Amended Complaint. Defendants

attempted to confer with Plaintiff but were unable to make contact. In further support of this motion, Defendants state as follows:

1. On November 11, 2020, Plaintiff filed her First Amended Complaint in the above referenced case.

2. Defendant Madison Management Services, LLC Defendant Waldman & Porras, PLLC Answer is currently due on December 2, 2020.

3. The undersigned was diagnosed positive with Covid-19 on November 11, 2020 and was ill and in quarantine out of state.

4. The undersigned is currently struggling with a backlog of work while still experiencing remaining symptoms.

5. On December 2, 2020, Christopher M. Jordan, Of Counsel for Defendant, attempted to confer telephonically with George Haines, Lead Counsel for Plaintiff, about extending Defendants' answers deadline and emailed the team as well.

6. The Defendants are requesting that Answers to the First Amended Complaint should be extended by fourteen (15) days, which would make new answer deadline December 17, 2020.

7. The relief requested herein is not for delay but so that justice may be done. Further, this relief will not result in any undue delay in the administration of this case.

WHEREFORE, PREMISES CONSIDERED, Defendant, with Plaintiff's agreement, respectfully requests this Court extend the time for Defendant to respond to Plaintiff's First Amended Complaint to **December 17, 2020.**

Dated: December 2, 2020

Respectfully submitted,

/s/ Nicholas M. Porras
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CERTIFICATE OF CONFERENCE

I hereby certify that I attempted to confer with Counsel for Plaintiff by phone and email on December 2, 2020, about whether Plaintiff agrees to the request that Defendants seek in this motion. I was unable to make contact.

/s/ Nicholas M. Porras
Nicholas M. Porras

CERTIFICATE OF SERVICE

Pursuant to Rule 5 of the Federal Rules of Civil Procedure, the undersigned counsel for the Defendant certifies that the foregoing document has been filed with the Court and served upon all known counsel of record via the Court's electronic case filing system and by first class mail, on December 2, 2020.

/s/ Nicholas M. Porras
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IT IS SO ORDERED.


U.S. MAGISTRATE JUDGE

Dated: December 3, 2020