

1 DIANA G. DICKINSON, ESQ., Bar No.13477  
 2 LITTLER MENDELSON, P.C.  
 3 3960 Howard Hughes Parkway  
 Suite 300  
 4 Las Vegas, NV 89169-5937  
 Telephone: 702.862.8800  
 Fax No.: 702.862.8811  
 Email: ddickinson@littler.com

5 Attorney for Defendant  
 6 BACKGROUNDCHECKS.COM, LLC

7  
 8 **UNITED STATES DISTRICT COURT**  
 9 **DISTRICT OF NEVADA**

11 HUGO BARRAGAN,  
 12 Plaintiff,  
 13 vs.  
 14 EARLY WARNING SERVICES, LLC;  
 THE RETAIL EQUATION; and  
 15 BACKGROUNDCHECKS.COM,  
 16 Defendants.

Case No. 2:20-cv-00795-KJD-VCF

**STIPULATION TO EXTEND TIME FOR  
 DEFENDANT  
 BACKGROUNDCHECKS.COM, LLC TO  
 FILE RESPONSIVE PLEADING  
 [SECOND REQUEST]**

18 Plaintiff HUGO BARRAGAN (“Plaintiff”) and Defendant BACKGROUNDCHECKS.COM,  
 19 LLC (“Defendant”), by and through their undersigned counsel, hereby agree and stipulate to extend  
 20 the time for Defendant to file a responsive pleading to Plaintiff’s Complaint for thirty (30) days from  
 21 the from the current deadline of June 25, 2020, up to and including **July 27, 2020**.

22 Pursuant to the inherent delays caused by the current COVID-19 pandemic, Defense counsel  
 23 has been unable to conduct a complete investigation. The requested extension is necessary for  
 24 additional time to investigate the allegations in the Complaint and prepare a response to the Complaint.

25  
 26 ///

1 This is the second request for an extension of time to respond to the Complaint. This request  
2 is made in good faith and not for the purpose of delay.

3  
4 Dated: June 22, 2020

Dated: June 22, 2020

5  
6 /s/ Matthew I. Knepper

7 DAVID KRIEGER, ESQ.  
KRIEGER LAW GROUP, LLC

8 MATTHEW I. KNEPPER, ESQ.  
9 MILES N. CLARK, ESQ.  
KNEPPER & CLARK LLC

10 Attorneys for Plaintiff  
HUGO BARRAGAN

/s/ Diana G. Dickinson

DIANA G. DICKINSON, ESQ.  
LITTLER MENDELSON, P.C.

Attorney for Defendant  
BACKGROUNDCHECKS.COM, LLC

11  
12 **IT IS SO ORDERED.**

13 Dated: June 22, 2020.

14  
15 

16 UNITED STATES MAGISTRATE JUDGE

17 4845-2132-6528.1 107811.1003