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5 *Attorneys for Defendant*  
 6 *Early Warning Services, LLC*

7 **IN THE UNITED STATES DISTRICT COURT**  
 8 **FOR THE DISTRICT OF NEVADA**

9 HUGO BARRAGAN,  
 10 Plaintiff,

11 vs.

12 EARLY WARNING SERVICES, LLC; THE  
 13 RETAIL EQUATION; and  
 BACKGROUNDCHECKS.COM,  
 14 Defendants.

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

**STIPULATION AND ORDER TO  
 EXTEND TIME FOR DEFENDANT  
 EARLY WARNING SERVICES,  
 LLC TO RESPOND TO  
 COMPLAINT  
 (Second Request)**

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 17 Defendant Early Warning Services, LLC (“EWS”) and Plaintiff Hugo Barragan  
 18 (“Plaintiff”), by counsel, and pursuant to LR IA 6-1, submit the following Stipulation to Extend  
 19 Time for Defendant Early Warning Services, LLC to Respond to Complaint, up to an including  
 20 July 13, 2020. In support of the Stipulation, the parties state the following:

- 21 1. EWS was served with the Complaint through its registered agent on or around May  
 22 5, 2020 making its responsive pleading due on or around May 26, 2020. This Court previously  
 23 granted the parties’ request to extend EWS’s deadline to respond to June 25, 2020.
- 24 2. The undersigned counsel for EWS was retained by EWS in connection with this  
 25 matter and is continuing to review the allegations asserted in the Complaint. In addition, the parties  
 26 have engaged in preliminary settlement discussions to see if an early resolution can be reached.
- 27 3. Counsel for Plaintiff has agreed to the requested extension and the requested  
 28 extension will not impact any other deadlines in this case.

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4. This is the second request to extend the deadline for EWS to file its responsive pleading.

5. This request for an extension of time is not intended to cause any undue delay or prejudice to any party.

6. Therefore, the parties hereby stipulate that the deadline for EWS to file its responsive pleading shall be extended through July 13, 2020.

DATED: June 25, 2020.

KNEPPER & CLARK LLC

McDONALD CARANO LLP

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Early Warning Services, LLC*

*Attorneys for Plaintiff  
Hugo Barragan*

**ORDER**

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: 6-25-2020