

1 Matthew I. Knepper, Esq.
 Nevada Bar No. 12796
 2 Miles N. Clark, Esq.
 Nevada Bar No. 13848
 3 KNEPPER & CLARK LLC
 5510 So. Fort Apache Rd, Suite 30
 4 Las Vegas, NV 89148
 Phone: (702) 856-7430
 5 Fax: (702) 447-8048
 Email: matthew.knepper@knepperclark.com
 6 Email: miles.clark@knepperclark.com

7
 8 David H. Krieger, Esq.
 Nevada Bar No. 9086
 9 KRIEGER LAW GROUP, LLC
 2850 W. Horizon Ridge Parkway, Suite 200
 10 Henderson, NV 89052
 Phone: (702) 848-3855, Ext. 101
 11 Email: dkrieger@kriegerlawgroup.com

12 *Attorneys for Plaintiff*

13 **UNITED STATES DISTRICT COURT**
 14 **DISTRICT OF NEVADA**

15 HUGO BARRAGAN,
 16
 Plaintiff,
 17
 v.
 18
 19 EARLY WARNING SERVICES, LLC; THE
 RETAIL EQUATION; and
 BACKGROUNDCHECKS.COM,
 20
 Defendants.
 21

Case No. 2:20-cv-00795-KJD-VCF
**STIPULATION AND ORDER TO EXTEND
 TIME FOR PLAINTIFF TO RESPOND TO
 MOTION TO DISMISS**
[FIRST REQUEST]
 Complaint filed: May 4, 2020

22 Plaintiff Hugo Barragan (“Plaintiff”), by and through his counsel of record, and Defendant
 23 The Retail Equation (“Retail Equation”) have agreed and stipulated to the following:

- 24 1. On May 4, 2020, Plaintiff filed a Complaint [ECF Dkt. 1].
- 25 2. On June 15, 2020, Retail Equation filed a Motion to Dismiss the Complaint [ECF
 26 Dkt.13].
- 27 3. Plaintiff’s Response is due June 29, 2020.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

4. Plaintiff and Retail Equation have agreed to extend Plaintiff's response fourteen days in order to allow the Parties to continue working toward an informal resolution, and to extend Retail Equation's deadline to file a reply in support of its motion for fourteen days for the same reasons. As a result, both Plaintiff and Retail Equation hereby request this Court to further extend the date for Plaintiff to respond to Retail Equation's Motion to Dismiss Complaint until **July 13, 2020**, and to extend the date for Retail Equation to file their Reply until **July 27, 2020**.

///

1 5. This stipulation is made in good faith, is not interposed for delay, and is not filed
2 for an improper purpose.

3 **IT IS SO STIPULATED.**

4 Dated June 26, 2020

5 **KNEPPER & CLARK LLC**

6 /s/ Matthew I. Knepper

7 Matthew I. Knepper, Esq., SBN 12796
8 Miles N. Clark, Esq., SBN 13848
9 5510 So. Fort Apache Rd, Suite 30
10 Las Vegas, NV 89148
11 Email: Matthew.Knepper@knepperclark.com
12 Email: Miles.Clark@knepperclark.com

13 **KRIEGER LAW GROUP, LLC**

14 David H. Krieger, Esq., SBN 9086
15 2850 W. Horizon Ridge Parkway, Suite 200
16 Henderson, NV 89052
17 Email: DKrieger@kriegerlawgroup.com

18 *Counsel for Plaintiff*

19 **LEWIS ROCA ROTHGERBER CHRISTIE LLP**

20 /s/ J. Christopher Jorgensen

21 J. Christopher Jorgensen, Esq., SBN 5382
22 Matthew R. Tsai, Esq., SBN 14290
23 3993 Howard Hughes Pkwy, Suite 600
24 Las Vegas, NV 89169-5996
25 Email: CJorgensen@lrrc.com
26 Email: MTsai@lrrc.com

27 **MAYER BROWN LLP**

28 John Nadolenco, Esq.
29 (Pro hac vice application submitted)
30 Email: JNadolenco@mayerbrown.com
31 Daniel D. Queen, Esq.
32 (Pro hac vice application submitted)
33 Email: DQueen@mayerbrown.com
34 350 South Grand Avenue, 25th Floor
35 Los Angeles, California 90071

36 *Counsel for Defendant The Retail Equation*

37 **ORDER GRANTING**
38 **STIPULATION TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO**
39 **MOTION TO DISMISS AND FOR DEFENDANT TO FILE REPLY IN SUPPORT OF**
40 **MOTION TO DISMISS**

41 **IT IS SO ORDERED.**

42 
43 _____
44 UNITED STATES DISTRICT JUDGE

45 Dated: 6/30/20

46 *Barragan v. Early Warning Services, LLC et al*
47 Case No.: 2:20-cv-00795-KJD-VCF