

1 George Haines, Esq.
 2 Nevada Bar No.: 9411
 3 Gerardo Avalos, Esq.
 4 Nevada Bar No.: 15171
 5 **FREEDOM LAW FIRM**
 6 8985 S. Eastern Ave., Suite 350
 7 Las Vegas, Nevada 89123
 8 (702) 880-5554
 9 (702) 385-5518 (fax)
 10 Ghaines@freedomlegalteam.com
 11 *Attorneys for Plaintiff Aaron Feld*

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

14 Aaron Feld,
 15
 16 Plaintiff,
 17 v.
 18 Navient Solutions, LLC and Pioneer
 19 Credit Recovery, Inc.,
 20 Defendants.

Case No.: 2:20-cv-01156-GMN-NJK

**Stipulation of dismissal of
 Plaintiff's FDCPA claims with
 prejudice**

1 Pursuant to Rule 41(a) of the Federal Rules of Civil Procedure, Aaron Feld
2 ("Plaintiff"); Navient Solutions, LLC; and Pioneer Credit Recovery, Inc. (jointly
3 as "Defendants") stipulate to dismiss count one of Plaintiff's complaint for
4 violations of the Fair Debt Collection Practices Act, 15 U.S.C. §§ 1692 et seq
5 against Defendants, with prejudice. Each party will bear its own costs,
6 disbursements, and attorney fees.

7 Plaintiff will continue to pursue counts two and three of his complaint for
8 violations of the Telephone Consumer Protection Act, 47 U.S.C. §227, et seq
9 against Defendants in this action.

10 Dated: March 26, 2021.

11 **FREEDOM LAW FIRM**

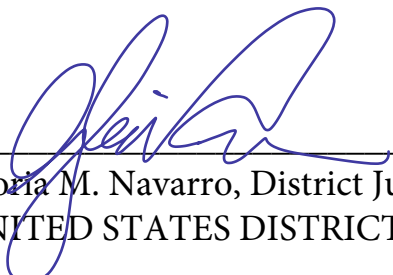
12 /s/ Gerardo Avalos
13 Gerardo Avalos, Esq.
14 8985 S. Eastern Ave., Suite 350
15 Las Vegas, Nevada 89123
16 *Counsel for Plaintiff*

17 **QUINTAIROS, PRIETO, WOOD & BOYER, P.A.**

18 /s/ Michael Ayers
19 Michael Ayers, Esq.
20 200 S. Virginia, 8th Floor
21 Reno, Nevada 89501
22 *Counsel for Defendants.*

IT IS SO ORDERED.

Dated this 29 day of March, 2021.

23
24
25 
26 _____
27 Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT