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

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

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

**Stipulation and Order for an
 extension of time for the Parties to
 respond to their respective motions
 for summary judgment**

21 Aaron Feld (“Plaintiff”), Navient Solutions LLC, and Pioneer Credit
 22 Recovery, Inc. (“Defendants”) (together as "the Parties") by counsel, hereby
 23 submit this Stipulation and Order for an extension of time for the Parties to
 24 respond to their respective motions for summary judgment. Both motions were
 25 filed on January 12, 2022, this is the second request for an extension of this
 26 deadline.
 27

1 The extension is sought because, although the March 24, 2022 Settlement
2 Conference with Judge Koppe was unsuccessful, the parties have since
3 reengaged in settlement discussions. The parties hope to avoid the additional
4 expense of briefing their respective motions, as without this added cost, may
5 put the parties in a better position to reach a resolution.

6 As such, the parties are requesting an extension of time to file their
7 respective oppositions to the motions for summary judgment by 30 days from
8 the current deadline of April 14, 2022 to **May 14, 2022**, with the reply deadline
9 moved from April 21, 2022 to **May 21, 2022**.

10 This Stipulation is brought in good faith and not for purposes of delay.
11 The parties hereby request that the Court order that the Parties' oppositions to
12 the pending motions for summary judgment shall be due on or before **May 14,**
13 **2022**, with the reply due on or before May 21, 2022.

14 Dated: April 7, 2022.

15
16 **FREEDOM LAW FIRM, LLC**

17 /s/ Gerardo Avalos

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23 /s/ Jessica Chong

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IT IS SO ORDERED.

Dated this 7 day of April, 2022.


Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT