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9 *Attorney for Plaintiff Aaron Feld*

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

10 Aaron Feld,

11 Plaintiff,

12 v.

13 Navient Solutions, LLC and Pioneer  
14 Credit Recovery, Inc.,

15 Defendant.

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

**Stipulation to extend the deadline to  
file the proposed discovery plan and  
scheduling order**

**(First request)**

17 Aaron Feld (“Plaintiff”) and Navient Solutions, LLC and Pioneer Credit  
18 Recovery, Inc. (“Defendants” and together with Plaintiff as the “Parties”), by and  
19 through their respective counsel, hereby stipulate to extend the deadline for the  
20 Parties to file their stipulated or proposed discovery plan and scheduling order. The  
21 deadline to file the proposed plan is currently set for August 31, 2020.

22 Good cause exists to continue the deadline. The Parties are actively discussing  
23 resolution and have been engaged in informal discovery. If settlement is not reached,  
24 Defendants are considering moving to stay this case, pending a ruling by the  
25 Supreme Court in another case that may impact Plaintiff’s TCPA claims in this case.  
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27

1 The Parties therefore agree that it is appropriate to extend the deadline for the  
2 Parties to file a proposed or stipulated discovery plan and scheduling order to allow  
3 time for the Parties to continue to explore early resolution. This request for an  
4 extension is made in good faith, as settlement discussions are ongoing. The Parties  
5 therefore seek to extend the deadline to file the proposed plan by fourteen (14) days,  
6 on or before **September 14, 2020**. This is the first request for an extension of these  
7 deadlines.

8 Dated: August 30, 2020.

9 **KIND LAW**

10  
11 /s/ Michael Kind  
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15 **HOLLEY DRIGGS**

16 /s/ Michael Ayers  
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19 Reno, Nevada 89521  
*Attorney for Navient Solutions, LLC and Pioneer Credit Recovery, Inc.*

20  
21 IT IS SO ORDERED:

22   
23 \_\_\_\_\_  
UNITED STATES MAGISTRATE JUDGE

24 DATED: September 1, 2020  
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26  
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