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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 MICHELLE MALUAFITI,

11 Plaintiff,

12 vs.

13 RUSHMORE LOAN SERVICING, LLC,

14 Defendant.

15 Case No.: 2:20-cv-01663-JCM-VCG

16 **STIPULATION FOR EXTENSION OF**  
**TIME FOR PLAINTIFF TO FILE**  
**RESPONSE TO DEFENDANT’S MOTION**  
**TO DISMISS**

17 (Second Request)

18 MICHELLE MALUAFITI (“Plaintiff”) and Defendant RUSHMORE LOAN MANAGEMENT  
 19 SERVICES, LLC (“Rushmore”), incorrectly named “Rushmore Loan Servicing, LLC” in the Complaint,  
 20 collectively the “Parties”, hereby jointly stipulate and agree to allow an extension of time for Plaintiff to  
 21 file a response to Rushmore’s Motion to Dismiss Plaintiff’s Complaint (“Motion to Dismiss”) to  
 22 **December 10, 2020.**

23 The Motion to Dismiss was filed on October 22, 2020 and appears on the docket as ECF #5.  
 24 Plaintiff’s current deadline to respond to the Motion to Dismiss is November 19, 2020. The reason for  
 25 the request is two-fold: (1) counsel for Plaintiff needs additional time to fully examine and respond to  
 26 the arguments and legal analysis set forth in the Motion to Dismiss and whether an amended complaint  
 27 could address the issues raised or whether a quick resolution to the matter may be available; and (2) due  
 28

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1 to COVID-19 and the State of Nevada’s recent restrictions, Plaintiff’s counsel has had to cancel its  
2 meeting with Plaintiff and will need a few weeks to reschedule that meeting to review information with  
3 the Plaintiff concerning the Motion to Dismiss. This is Plaintiff’s second request for an extension.  
4 Rushmore will not be prejudiced by the delay and has agreed to the extension of time. This stipulation  
5 has not been submitted for the purpose of delay or other impermissible purpose.  
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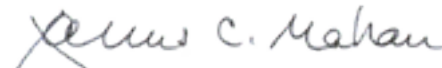
7 Stipulated and agreed on this date: November 13, 2020.

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9 /s/ Shawn W. Miller  
10 David H. Krieger, Esq.  
11 Shawn W. Miller, Esq.  
12 KRIEGER LAW GROUP, LLC  
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14 Henderson, Nevada 89052  
15 *Attorneys for Plaintiff*

16 /s/ Jeffrey S. Allison  
17 Jeffrey S. Allison, Esq.  
18 HOUSER LLP  
19 9970 Research Drive  
20 Irvine, California 92618  
21 *Attorneys for Defendant*

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**ORDER GRANTING EXTENSION OF TIME**

IT IS SO ORDERED.

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UNITED STATES DISTRICT JUDGE

Dated: November 20, 2020