

1 WILLIAM P. VOLK, ESQ.
 Nevada Bar No. 6157
 2 Email: wvolk@nevadafirm.com
 JESSICA M. LUJAN, ESQ.
 3 Nevada Bar No. 14913
 Email: jlujan@nevadafirm.com
 4 HOLLEY DRIGGS
 400 South Fourth Street, Third Floor
 5 Las Vegas, Nevada 89101
 Telephone: (702) 791-0308
 6 Facsimile: (702) 791-1912

7 and

8 MILTON G. HAMMOND (pro hac vice forthcoming)
 Texas Bar No. 08867720
 9 RAMJI LAW GROUP, P.C.
 9186 Katy Freeway
 Houston, TX 77055
 10 Telephone: (832) 674-0209
 Facsimile: (866) 672-3372
 11 Email: mhammond@calltheram.com
 Service Email: service@ramjilaw.com

12 Attorneys for Defendant James Settlement Services, LLC

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

<p>17 KENNETH LANE, et al., Plaintiffs, 18 v. 19 CONESTOGA SETTLEMENT SERVICES, LLC, et al., 20 Defendants.</p>	<p>Case No.: 2:20-cv-01716-APG-BNW STIPULATION TO EXTEND THE TIME FOR DEFENDANT JAMES SETTLEMENT SERVICES, LLC TO RESPOND TO COMPLAINT (FIRST REQUEST)</p>
--	---

21
 22 Plaintiffs, by and through their counsel of record, Reese Marketos LLP and King &
 23 Durham, PLLC, and Defendant James Settlement Services, LLC (“JSS”), by and through its
 24 counsel of record, Ramji Law Group, hereby stipulate to an extension of time by which JSS must

1 respond to the Complaint by, and including, **November 9, 2020** (November 8 being a Sunday).

2 This Stipulation is made and based upon the following:

3 1. Plaintiffs filed their Complaint on September 17, 2020, in which they allege that
4 Defendants engaged in tortious conduct and misrepresented certain aspects of life settlement
5 investments. (ECF No. 1). Plaintiffs seek certification to represent a class of similarly situated
6 individuals across the country. Id.

7 2. JSS was served with the Complaint on September 18, 2020. JSS's response is
8 currently due October 9, 2020.

9 3. Counsel for JSS represent that they have recently been engaged and require
10 additional time to evaluate Plaintiffs' allegations and prepare a response, taking into account the
11 exercise of due diligence.

12 4. In light of the foregoing, the parties agree and request that JSS shall have up to, and
13 including, **November 9, 2020**, to respond to the Complaint.

14 5. JSS thus requests that the Court accept this Stipulation and enter this proposed
15 order. This is the first request for an extension of time. This Stipulation is entered into in good
16 faith and not for purposes of delay.

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

1 6. Counsel for JSS will submit a pro hac vice motion on or before the requested
2 answer date.

3
4 DATED this 8th day of October, 2020.

5 By: /s/ William P. Volk

6 WILLIAM P. VOLK, ESQ.
7 Nevada Bar No. 6157
8 JESSICA M. LUJAN, ESQ.
9 Nevada Bar No. 14913
10 HOLLEY DRIGGS
11 400 South Fourth Street, Third Floor
12 Las Vegas, Nevada 89101

13 And

14 MILTON G. HAMMOND, ESQ.
15 (pro hac vice forthcoming)
16 Texas Bar No. 08867720
17 RAMJI LAW GROUP, LLC
18 9186 Katy Freeway
19 Houston, TX 77055

20 Counsel for Defendant JSS

DATED this 8th day of October, 2020.

By: /s/ Matthew L. Durham (with permission)

MATTHEW L. DURHAM, ESQ.
Nevada Bar No. 10342
KING DURHAM
6385 S. Rainbow Rd., Ste. 220
Las Vegas, Nevada 89118

Counsel for Plaintiff Kenneth Lane

21 **IT IS SO ORDERED**

22 **DATED:** 12:23 pm, October 14, 2020

23 

24 **BRENDA WEKSLER**
UNITED STATES MAGISTRATE JUDGE