

1 WILLIAM J. SIMMONS, ESQ., Pennsylvania, Bar No. 206860  
*Admitted Pro Hac Vice*  
 2 LITTLER MENDELSON, P.C.  
 1601 Cherry Street, Suite 1400  
 3 Philadelphia, PA 19102-1321  
 Telephone: 267.402.3000  
 4 Fax No.: 267.402.3131  
 Email: wsimmons@littler.com

5 DIANA G. DICKINSON, ESQ., Bar No. 13477  
 6 LITTLER MENDELSON, P.C.  
 3960 Howard Hughes Parkway  
 7 Suite 300  
 Las Vegas, NV 89169-5937  
 8 Telephone: 702.862.8800  
 Fax No.: 702.862.8811  
 9 Email: ddickinson@littler.com

10 Attorneys for Defendant  
 BACKGROUNDCHECKS.COM LLC

11  
 12 **UNITED STATES DISTRICT COURT**  
 13 **DISTRICT OF NEVADA**  
 14

15 Jose A. Iraheta Hernandez,  
 16  
 Plaintiff/s,  
 17  
 vs.  
 18 Backgroundchecks.com, LLC,  
 19  
 Defendant/s.

Case No. 2:20-cv-01766-GMN-BNW

**STIPULATION FOR AN EXTENSION OF  
 TIME FOR DEFENDANT TO FILE A  
 REPLY IN SUPPORT OF ITS MOTION  
 TO STAY DISCOVERY  
 (FIRST REQUEST)**

20  
 21  
 22 JOSE A. IRAHETA HERNANDEZ (“Plaintiff”) and BACKGROUNDCHECKS.COM LLC  
 23 (“Defendant”), by and through their undersigned counsel, hereby agree and stipulate to extend the time  
 24 for Defendant to file its reply in support of its Motion to Stay Discovery filed on January 22, 2021  
 25 (ECF No. 26) from the current deadline of February 12, 2021, up to and including **February 26, 2021**.

26 This is the first request for an extension of this deadline. The extension is requested to  
 27 accommodate the workload and schedule of defense counsel, is sought in good faith, and is not made  
 28 for the purposes of delay.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

The parties agree that good cause exists for this extension.

Dated: February 9, 2021

Dated: February 9, 2021

Respectfully submitted,

Respectfully submitted,

/s/ Michael Kind

/s/ Diana G. Dickinson

MICHAEL KIND, ESQ.  
KIND LAW

WILLIAM J. SIMMONS, ESQ.  
DIANA G. DICKINSON, ESQ.  
LITTLER MENDELSON, P.C.

GEORGE HAINES, ESQ.  
GERARDO AVALOS, ESQ.  
FREEDOM LAW FIRM, LLC

Attorneys for Defendant  
BACKGROUNDCHECKS.COM LLC

Attorneys for Plaintiff  
JOSE A. IRAHETA HERNANDEZ

**IT IS SO ORDERED.**

Dated: February 16, 2021.

UNITED STATES MAGISTRATE JUDGE

4821-3936-7387.1 103757.1007