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12 *Attorneys for Defendant Discover*  
13 *Financial Services, LLC*

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

18 NATHALIE SANTOS, an individual,

19 Case No.: 2:20-cv-02053-JCM-VCF

20 Plaintiff,

21 vs.

22 DISCOVER FINANCIAL SERVICES  
23 LLC, a foreign limited-liability company;  
24 EQUIFAX INFORMATION SERVICES,  
25 LLC, a foreign limited-liability company;  
26 EXPERIAN INFORMATION  
27 SOLUTIONS, INC., a foreign corporation,

28 Defendant.

29  
30 **DISCOVER FINANCIAL  
31 SERVICES, LLC'S UNOPPOSED  
32 MOTION TO EXTEND  
33 DEADLINE TO RESPOND TO  
34 COMPLAINT**  
35  
36 **(FIRST REQUEST)**

37 Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), Discover Financial Services,  
38 LLC ("Discover"), through its attorneys, respectfully requests that the Court extend the  
39 deadline in which Discover has to answer or otherwise plead to Plaintiff's Complaint, by  
40 fourteen (14) days, through and until January 25, 2021. In support of its Motion, Discover  
41 states as follows:

- 42 1. Plaintiff's Complaint was filed on November 6, 2020. [ECF No. 1].
- 43 2. After executing a waiver of service, Discover's deadline to respond to the  
44 Plaintiff's Complaint is currently January 11, 2021.
- 45 3. Discover now respectfully requests that the Court extend Discover's deadline  
46 to respond to the Complaint by fourteen (14) days through and including January 25, 2021.

4. This is Discover's first request for an extension; this request is brought in good faith and not made to unnecessarily delay discovery or the proceedings in this matter.

5. No party will be prejudiced by the requested extension nor, respectfully, will the extension unduly burden the Court.

6. Counsel for Discover sought concurrence to this motion from counsel for Plaintiff and concurrence was obtained to extend the deadline to January 25, 2021. Counsel for Plaintiff has agreed to extend the response deadline by fourteen (14) days.

**WHEREFORE** defendant Discover respectfully requests that the Court grant its Unopposed Motion to Extend Deadline to Respond to Complaint (“Motion”), extending its deadline to answer or otherwise plead to Plaintiff’s Complaint through and until January 25, 2021, and award such other relief the Court deems just and proper.

DATED this 7<sup>th</sup> day of January, 2021.

LEWIS ROCA ROTHGERBER CHRISTIE LLP

/s/ J Christopher Jorgensen

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*Attorneys for Defendant Discover Financial Services, LLC*

## ORDER

## IT IS SO ORDERED

**United States Magistrate Judge**

Data 1 1-7-2021

**CERTIFICATE OF SERVICE**

I hereby certify that on this 7<sup>th</sup> day of January, 2021, I caused a true and accurate copy of the foregoing document entitled *Discover Financial Services, LLC's Unopposed Motion to Extend Deadline to Respond to Complaint* to be filed with the Clerk of the Court via the CM/ECF system, which will send an electronic copy to all interested parties.

/s/ Annette Jaramillo  
An employee of Lewis Roca  
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