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

15 WILLIAM BERRY, JR,

16 Plaintiff,

17 vs.

18 AARGON AGENCY, INC; PLUSFOUR, INC;
19 QUANTUM COLLECTIONS; AND
20 RICHLAND HOLDINGS, INC DBA
21 ACCOUNTCORP OF SOUTHERN NEVADA,

22 Defendants.

23 Case No.: 2:20-cv-02144-APG-EJY

24 **JOINT MOTION FOR EXTENSION OF**
25 **TIME FOR PLAINTIFF TO FILE**
26 **RESPONSE TO DEFENDANT RICHLAND**
27 **HOLDINGS, INC. DBA ACCOUNTCORP**
28 **OF SOUTHERN NEVADA'S MOTION TO**
29 **DISMISS**

30 (First Request)

31 WILLIAM BERRY, JR (“Plaintiff”) and Defendant RICHLAND HOLDINGS, INC. DBA
32 ACCOUNTCORP OF SOUTHERN NEVADA (“Richland”), collectively the “Parties”, hereby jointly
33 submit this motion (“Joint Motion”) for an extension of time for Plaintiff to file a response to Richland’s
34 Motion to Dismiss (“Motion to Dismiss”) to **January 13, 2021**. This is the same date Plaintiff’s response
35 is due to Plus Four Inc.’s Motion to Dismiss. Additionally, Richland’s reply brief, if any, shall be
36 extended to **February 10, 2021**, the same date Plus Four’s reply brief is due (Plus Four is another
37 Defendant in this matter). Richland’s Motion to Dismiss was filed on December 22, 2020 and appears
38 on the docket as ECF #13. Plaintiff’s current deadline to respond to Richland’s Motion to Dismiss is
39 January 5, 2021.

1 The reason for the request is because of the holidays, counsel for Plaintiff needs additional time
 2 to communicate with Plaintiff about the issues raised in the Motion to Dismiss, and fully examine and
 3 respond to the arguments and legal analysis set forth in the Motion to Dismiss and evaluate whether
 4 dismissal or an amended pleading would resolve the issues raised in the Motion to Dismiss.

5 This is the Plaintiff's first request for an extension and this Joint Motion has not been submitted
 6 for the purpose of delay or other impermissible purpose. Richland will not be prejudiced by the delay
 7 and has agreed to the extensions of time. Additionally, the requested extension will not prejudice or
 8 directly affect the other Defendants in this case. Accordingly, it is requested that the Court grant the
 9 extension of time to respond to the Motion to Dismiss to January 13, 2021 and any reply brief to February
 10, 2021.

12 Dated: January 5, 2021.
 13

14 Submitted By:

15 /s/ Shawn W. Miller

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 21 *Attorneys for Plaintiff*

14 No Opposition:

15 /s/ Jared M. Moser

16 Chad F. Clement, Esq. (NSB 12192)
 17 Jared M. Moser, Esq. (NSB 13003)
 18 MARQUIS AURBACH COFFING
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 20 Las Vegas, Nevada 89145
 21 Attorneys for Defendant
 22 Richland Holdings, Inc., dba AcctCorp of
 23 Southern Nevada

22 **ORDER GRANTING EXTENSION OF TIME**

23 IT IS SO ORDERED.



24
 25 UNITED STATES DISTRICT JUDGE
 26

27 Dated: January 5, 2021
 28