

1 Joel E. Tasca, Esq.  
 Nevada Bar No. 14124  
 2 Emil S. Kim, Esq.  
 Nevada Bar No. 14894  
 3 BALLARD SPAHR LLP  
 1980 Festival Plaza Drive, Suite 900  
 4 Las Vegas, Nevada 89135  
 Telephone: (702) 471-7000  
 5 Facsimile: (702) 471-7070  
 tascaa@ballardspahr.com  
 6 kime@ballardspahr.com

7 *Attorneys for Defendant*  
 8 *Discover Bank*

9 **IN THE UNITED STATES DISTRICT COURT**  
 10 **FOR THE DISTRICT OF NEVADA**

11 DONNA M. FLOWERS;

CASE NO. 2:20-cv-02152-RFB-VCF

12 Plaintiff,

**STIPULATION AND ORDER TO  
 EXTEND TIME FOR DEFENDANT  
 DISCOVER BANK TO RESPOND TO  
 PLAINTIFF'S COMPLAINT**

13 v.

14 DISCOVER BANK;

15 Defendant.

**(Third Request)**

BALLARD SPAHR LLP  
 1980 FESTIVAL PLAZA DRIVE, SUITE 900  
 LAS VEGAS, NEVADA 89135  
 (702) 471-7000 FAX (702) 471-7070

18 Plaintiff Donna M. Flowers (“Plaintiff”) and Defendant Discover Bank  
 19 (“Discover”)<sup>1</sup> stipulate and agree that Discover has up to and including March 1, 2021  
 20 to respond to Plaintiff’s Complaint (ECF No. 1), to provide additional time to  
 21 investigate Plaintiff’s allegations and for Discover to prepare a response.

22 [continued on next page]

27 <sup>1</sup> By filing this Stipulation, Discover is not waiving any defense, affirmative or  
 28 otherwise, it may have in this matter.

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

This is the third request for an extension, and is made in good faith and not for purposes of delay.

Dated this 12<sup>th</sup> day of February, 2021.

BALLARD SPAHR LLP

MITCHELL D. GLINER, ESQ.

By: /s/ Joel E. Tasca  
Joel E. Tasca, Esq.  
Nevada Bar No. 14124  
Emil S. Kim, Esq.  
Nevada Bar No. 14894  
1980 Festival Plaza Drive, Suite 900  
Las Vegas, Nevada 89135

By: /s/ Mitchell D. Gliner  
Mitchell D. Gliner, Esq.  
Nevada Bar No. 3419  
3017 W. Charleston Boulevard, #95  
Las Vegas, Nevada 89102  
*Attorneys for Plaintiff Donna M. Flowers*

*Attorneys for Defendant  
Discover Bank*

BALLARD SPAHR LLP  
1980 FESTIVAL PLAZA DRIVE, SUITE 900  
LAS VEGAS, NEVADA 89135  
(702) 471-7000 FAX (702) 471-7070

**ORDER**

IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

DATED: 2-17-2021