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6 *Attorneys for Defendant AmeriCredit Corp./General*
 7 *Motors Financial Company, Inc.*

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 CYNTHIA L. MUYDERMAN, an
 individual,
 11
 Plaintiff,
 12
 vs.
 13 GENERAL MOTORS FINANCIAL
 14 COMPANY, INC., a foreign corporation;
 TRANS UNION LLC; a foreign limited-
 liability company;
 15
 Defendant.
 16

Case No.: 2:20-cv-02172-APG-DJA
 Compl. Filed: November 27, 2020

**STIPULATION TO EXTEND
 DEFENDANT AMERICREDIT
 CORP./GENERAL MOTORS
 FINANCIAL COMPANY, INC.’S
 TIME TO RESPOND TO
 COMPLAINT**

(FIRST REQUEST)

17
 18 This Stipulation to extend defendant AmeriCredit Corp./General Motors Financial
 19 Company, Inc.’s time to respond to complaint is made by and between Plaintiff Cynthia L.
 20 Muyderman (“Plaintiff”) and Defendant AmeriCredit Corp./General Motors Financial Company,
 21 Inc. (“AmeriCredit/GM”) through their respective counsel, in light of the following facts:

22 RECITALS

- 23 A. Plaintiff filed the Complaint (“Complaint”) against Defendants on or about
 24 November 27, 2020.
- 25 B. AmeriCredit/GM was served with the Complaint on or about January 28, 2021.
- 26 C. AmeriCredit/GM’s current deadline to respond to the Complaint is due March 29,
 27 2021.
- 28 D. The parties agree that AmeriCredit/GM will have through April 5, 2021, to

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1 respond to the Complaint in order to give AmeriCredit/GM time to investigate Plaintiff's claims
2 and prepare a proper response, and for the parties to discuss a potential resolution of this matter.

3 E. There is good cause to grant this stipulation because AmeriCredit/GM requires
4 additional time to investigate Plaintiff's claims and prepare a proper response, and the parties
5 require additional time to consider a resolution of this matter.

6 F. This stipulation is filed in good faith and not intended to cause delay.

7 G. Pursuant to Local Rule IA 6-2 and Local Rule 7.1, Plaintiff and AmeriCredit/GM
8 respectfully request that the Court extend AmeriCredit/GM's time to respond to Plaintiff's
9 Complaint through April 5, 2021.

10 **STIPULATION**

11 NOW, THEREFORE, Plaintiff and AmeriCredit/GM hereby stipulate and agree that
12 AmeriCredit/GM has up to and including April 5, 2021, to file a response to Plaintiff's
13 Complaint.

14 **IT IS SO STIPULATED.**

15 DATED this 30th day of March, 2021

DATED this 30th day of March, 2021

16 **LAW OFFICE OF KEVIN L. HERNANDEZ**

LEWIS ROCA ROTHGERBER CHRISTIE

17 By: /s/ Kevin Hernandez
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21 *Attorneys for Plaintiff*
Cynthia L. Muyderman

*Attorneys for Defendant AmeriCredit
Corp./General Motors Financial
Company, Inc.*

22 **ORDER**

23 **IT IS SO ORDERED.**

24 
25 _____
26 United States Magistrate Judge

27 Dated: March 31, 2021
28 _____

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LEWIS  ROCA