

**JENNIFER BERGH**

Nevada Bar No. 14480

**QUILLING SELANDER LOWNDS**

**WINSLETT & MOSER, P.C.**

2001 Bryan Street, Suite 1800

Dallas, Texas 75201

Telephone: (214) 560-5460

Facsimile: (214) 871-2111

[jbergh@qslwm.com](mailto:jbergh@qslwm.com)

**COUNSEL FOR TRANS UNION LLC**

**\*\*Designated Attorney for Personal Service\*\***

Trevor Waite, Esq.

Nevada Bar No.: 13779

6605 Grand Montecito Parkway, Suite 200

Las Vegas, Nevada 89149

**IN THE UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF NEVADA**

JAMES ROOT,

Plaintiff,

v.

AMERICAN EXPRESS NATIONAL BANK,  
EXPERIAN INFORMATION SOLUTIONS,  
INC., TRANS UNION LLC,

Defendants.

Case No. 2:20-cv-02267-RFB-NJK

**JOINT MOTION AND ORDER  
EXTENDING DEFENDANT TRANS  
UNION LLC’S TIME TO FILE AN  
ANSWER OR OTHERWISE  
RESPOND TO PLAINTIFF’S  
COMPLAINT**

**(FIRST REQUEST)**

Plaintiff James Root (“Plaintiff”) and Defendant Trans Union LLC (“Trans Union”), by and through their respective counsel, file this Joint Motion Extending Defendant Trans Union’s Time to File an Answer or Otherwise Respond to Plaintiff’s Complaint.

1. On December 15, 2020, Plaintiff filed his Complaint. The current deadline for Trans Union to answer or otherwise respond to Plaintiff’s Complaint is February 16, 2021.

2. On February 15, 2021, counsel for Trans Union communicated with Plaintiff’s counsel via email regarding an extension within which to file a response to the Complaint, and Plaintiff’s counsel agreed to the extension.

3. The parties are actively discussing a potential early resolution of this case, and the parties believe an extension of this nature may save waste of the parties’ time and expense. The

1 additional time will allow Plaintiff and Trans Union time to fully explore such early settlement  
2 discussions.

3 4. Moreover, Trans Union's counsel will need additional time to review the  
4 documents and respond to the allegations in Plaintiff's Complaint. This Joint Motion is made  
5 in good faith and not for the purposes of delay.

6 5. Plaintiff has agreed to extend the deadline in which Trans Union has to answer or  
7 otherwise respond to Plaintiff's Complaint up to and including March 8, 2021. This is the first  
8 motion for extension of time for Trans Union to respond to Plaintiff's Complaint.

9 Dated this 16th day of February 2021.

10 QUILLING SELANDER LOWNDS  
11 WINSLETT & MOSER, P.C.

12 */s/ Jennifer Bergh*

13 Jennifer Bergh  
14 Nevada Bar No. 14480  
15 2001 Bryan Street, Suite 1800  
16 Dallas, Texas 75201  
17 Telephone: (214) 560-5460  
18 Facsimile: (214) 871-2111  
19 [jbergh@qslwm.com](mailto:jbergh@qslwm.com)  
20 **COUNSEL FOR TRANS UNION LLC**

21 LAW OFFICE OF KEVIN L. HERNANDEZ

22 */s/ Kevin L. Hernandez*

23 Kevin L. Hernandez  
24 Nevada Bar No. 12594  
25 8872 S. Eastern Ave., Suite 270  
26 Las Vegas, NV 89123  
27 Telephone: (702) 563-4450  
28 Facsimile: (702) 552-0408  
[kevin@kevinhernandezlaw.com](mailto:kevin@kevinhernandezlaw.com)  
**COUNSEL FOR PLAINTIFF**

**ORDER**

The Joint Motion for Extension of Time for Trans Union LLC to file an answer or otherwise respond to Plaintiff's Complaint is so ORDERED AND ADJUDGED.

Dated: February 17, 2021



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**UNITED STATES MAGISTRATE JUDGE**

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