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Attorney for Defendant
BACKGROUNDCHECKS.COM LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ROOSEVELT NEROES,
Plaintiff,

vs.

BACKGROUNDCHECKS.COM,
Defendant.

Case No. 2:20-cv-02307-RFB-BNW

**STIPULATION TO EXTEND TIME FOR
DEFENDANT
BACKGROUNDCHECKS.COM LLC TO
FILE RESPONSIVE PLEADING**

[SECOND REQUEST]

Plaintiff ROOSEVELT NEROES (“Plaintiff”) and Defendant
BACKGROUNDCHECKS.COM LLC (“Defendant”), by and through their undersigned counsel,
hereby agree and stipulate to extend the time for Defendant to file a response to the Complaint from
the current deadline of February 12, 2021, up to and including **March 5, 2021**.

This is the second request for an extension of time to respond to the Complaint. The requested
extension is necessary in light of the fact the parties have begun discussions regarding the scope and
handling of the case and potential resolution of this matter.¹ The additional time will allow the parties
to complete these discussions for efficiency before having to engage in motion practice.

This request is made in good faith and not for the purpose of delay, and the parties believe the

¹ Some of the issues discussed include Defendant’s contention that personal jurisdiction and venue is improper, and that nothing contained in this Stipulation waives those contentions.

interests of judicial economy support granting this extension.

Dated: February 11, 2021

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/s/ Shawn Miller

DAVID KRIEGER, ESQ.
SHAWN MILLER, ESQ.
KRIEGER LAW GROUP, LLC

/s/ Diana G. Dickinson

DIANA G. DICKINSON, ESQ.
LITTLER MENDELSON, P.C.

Attorneys for Plaintiff
ROOSEVELT NEROES

Attorney for Defendant
BACKGROUNDCHECKS.COM LLC

IT IS SO ORDERED.

Dated: February 16, 2021.



UNITED STATES MAGISTRATE JUDGE

4823-7997-1036.1 107811.1000