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12 *Attorney for Defendant Nationstar Mortgage LLC
13 d/b/a Mr. Cooper*

14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

16 BRETT PADALECKI, individually, on behalf
17 of himself and other similarly situated

18 Plaintiff,
19 vs.
20 NATIONSTAR MORTGAGE LLC d/b/a MR.
21 COOPER,
22 Defendant.

23 CASE NO. 2:21-cv-0938-RFB-VCF

24 **STIPULATION TO EXTEND TIME TO
25 RESPOND TO PLAINTIFF'S
COMPLAINT**

26 Defendant Nationstar Mortgage LLC d/b/a Mr. Cooper (Nationstar and Padalecki are
27 collectively referred to as the "Parties"), by and through their respective attorneys of record, hereby
submit the following Stipulation:

28 On May 14, 2021, Plaintiff filed his Complaint [ECF No. 1]. The Summons to Defendant was
1 issued on May 14, 2021 [ECF No. 4]. Defendant has 21 days from when the summons was served,
2 May 20, 2021, in this instance, to file its responsive pleading. Because Defendant's counsel is still
3 investigating the allegations raised in Plaintiff's Complaint, the Parties have discussed extending the
4 deadline for Defendant to respond to the Complaint by thirty days to July 9, 2021.

5 WHEREAS, the Parties hereby stipulate and agree to extend the deadline for Defendant to file
6 its responsive pleading to July 9, 2021.

1 This is the first stipulation for extension of time for Defendant to respond to Plaintiff's
2 Complaint. The extension is requested in good faith and is not for purposes of delay or prejudice to
3 any other party.

4 Dated this 4th day of June, 2021.

5 **AKERMAN LLP**

6
7 /s/ Melanie Morgan
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19 *Attorneys for Defendant Nationstar*
20 *Mortgage d/b/a Mr. Cooper*

21 Dated this 4th day of June, 2021.

22 **FREEDOM LAW FIRM, LLC**

23
24 /s/ George Haines
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52
53 *Attorneys for Plaintiff*

54 IT IS SO ORDERED.



55
56 Cam Ferenbach
57 United States Magistrate Judge

58
59 Dated: 6-7-2021

1

CERTIFICATE OF SERVICE

2 I HEREBY CERTIFY that I am an employee of Akerman LLP, and that on the 4th day of June,
3 2021, I caused to be served a true and correct copy of the foregoing **STIPULATION TO EXTEND**
4 **TIME TO RESPOND TO PLAINTIFF'S COMPLAINT**, in the following manner:

5 (ELECTRONIC SERVICE) Pursuant to FRCP 5(b), the above referenced document
6 was electronically filed on the date hereof with the Clerk of the Court for the United States District
7 Court by using the Court's CM/ECF system and served through the Court's Notice of electronic filing
8 system automatically generated to those parties registered on the Court's Master E-Service List.

9 George Haines, Esq. FREEDOM LAW FIRM, LLC 8985 S. Eastern Ave., Suite 350 Las Vegas, NV 89123 ghaines@freedomlegaleteam.com Attorneys for Plaintiff	10 Norberto J. Cisneros, Esq., Barbara M. McDonald, Esq., MADDOX & CISNEROS LLP 3230 S. Buffalo Drive, Suite 108 Las Vegas, Nevada 89117 Attorneys for Plaintiff
11 Michael Kind, Esq. KIND LAW 8860 South Maryland Parkway, Suite 106 Las Vegas, Nevada 89123 mk@kindlaw.com Attorneys for Plaintiff	12

13 (UNITED STATES MAIL) By depositing a copy of the above-referenced document
14 for mailing in the United States Mail, first-class postage prepaid, at Las Vegas, Nevada, to the parties
15 listed below at their last-known mailing addresses, on the date above written: N/A.

16 (PERSONAL SERVICE) By causing to be personally delivered a copy of the above-
17 referenced document to the person(s) listed below: N/A.

18 (EMAIL) By emailing (as opposed to the Court's electronic service) a true and correct
19 copy of the above-referenced document to the person(s) listed below: N/A.

20 I declare that I am employed in the office of a member of the bar of this Court at whose
21 discretion the service was made.

22 */s/ Carla Llarena*

23 An employee of AKERMAN LLP