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11 **IN THE UNITED STATES DISTRICT COURT**
 12 **FOR THE DISTRICT OF NEVADA**

13 MARDI ROMANO,

14 Plaintiff,

15 v.

16 TRANS UNION, LLC, JPMORGAN CHASE
 BANK, NA, CREDIT COLLECTION
 17 SERVICES, INC., and CREDIT CONTROL
 SERVICES, INC.,

18 Defendants.

Case No. 2:21-cv-001150-JCM-EJY

**JOINT MOTION AND ORDER
 EXTENDING DEFENDANT TRANS
 UNION LLC'S TIME TO FILE AN
 ANSWER OR OTHERWISE
 RESPOND TO PLAINTIFF'S
 COMPLAINT (SECOND REQUEST)**

19
 20 Plaintiff Mardi Romano ("Plaintiff") and Defendant Trans Union LLC ("Trans Union"),
 21 by and through their respective counsel, files this Joint Motion Extending Defendant Trans
 22 Union's Time to File an Answer or Otherwise Respond to Plaintiff's Complaint.

23 1. On June 17, 2021, Plaintiff filed her Complaint. On August 10, 2021, Trans Union
 24 filed the Joint Motion Extending Defendant Trans Union's Time to File an Answer or Otherwise
 25 Respond to Plaintiff's Complaint (Dkt. 10). The current deadline for Trans Union to answer or
 26 otherwise respond to Plaintiff's Complaint is September 7, 2021. Trans Union requests a
 27 twenty-one (21) day extension of that deadline, up to and including September 28, 2021.

28 2. The allegations in Plaintiff's Complaint date back to September 2018 and relate
 to a Chase account allegedly reporting on Plaintiff's credit file. Trans Union needs additional

1 time to locate and assemble documents relating to Plaintiff's credit file, any disputes submitted
2 by Plaintiff, and Trans Union's reinvestigation of any such disputes. In addition, Trans Union's
3 counsel will need additional time to review and analyze Trans Union's documents so that it may
4 respond to the specific allegations contained in Plaintiff's Complaint. Moreover, the parties will
5 actively discuss a potential early resolution of this case, and the parties believe an extension of
6 this nature may save waste of the parties' time and expense. The additional time will allow
7 Plaintiff and Trans Union time to fully explore such early settlement discussions.

8 3. On September 7, 2021, counsel for Trans Union communicated with Plaintiff's
9 counsel regarding an extension within which to file a response to the Complaint, and Plaintiff's
10 counsel agreed to the extension.

11 4. Plaintiff has agreed to extend the deadline in which Trans Union has to answer or
12 otherwise respond to Plaintiff's Complaint up to and including September 28, 2021. This is the
13 second motion for extension of time for Trans Union to respond to Plaintiff's Complaint.

14 Dated this 7th day of September 2021.

15 **QUILLING SELANDER LOWNDS**
16 **WINSLETT & MOSER, P.C.**

17 */s/ Jennifer Bergh*

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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 this 7th day of September, 2021.



UNITED STATES MAGISTRATE JUDGE