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13 UNITED STATES DISTRICT COURT
14 DISTRICT OF NEVADA
15

16 MICHAELA CHRISTIAN,

17 Plaintiffs,

18 vs.

19 WELLS FARGO BANK, N.A.,

20 Defendant.

21 Case No. 2:21-cv-01419-APG-EJY

22 **STIPULATION AND ORDER TO
23 EXTEND TIME TO RESPOND TO
24 COMPLAINT**

25 **(First Request)**

26 Plaintiff Michaela Christian (“Plaintiff”) and Wells Fargo Bank, N.A. (“Wells Fargo” and
27 together with Plaintiff, the “Parties”), by and through their respective counsel, hereby stipulate
28 and agree to extend Wells Fargo’s deadline to respond to Plaintiff’s Complaint [ECF No. 1] to
September 27, 2021, for the following reasons:

1. Plaintiff served the Complaint and Summons on Wells Fargo on or about August
5, 2021, making Wells Fargo’s Answer currently due August 26, 2021.

2. Undersigned counsel was just retained on August 27, 2021, and along with Wells
Fargo, requires additional time to investigate the allegations set forth in the Complaint and to
prepare the appropriate response. Wells Fargo therefore requests an additional thirty (30) days to
respond to Plaintiff’s Complaint.

3. On August 28, 2021, counsel for Plaintiff agreed to the extension requested herein.

4. This extension request is sought in good faith and is not made for the purpose of
delay.

Therefore, the Parties respectfully request an extension for Wells Fargo to respond to Plaintiff's Complaint to and including September 27, 2021.

Dated September 8, 2021

Dated September 8, 2021

FREEDOM LAW FIRM

SNELL & WILMER LLP

By: /s/ George Haines

By: /s/ Kelly H. Dove

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Attorney for Plaintiff Michaela Christian

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ORDER

IT IS SO ORDERED.

Rayna J. Jouchan
UNITED STATES MAGISTRATE JUDGE

DATED: September 8, 2021

4850-4729-5993