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13 Attorneys for Plaintiff  
 14 IBUUMERANG

15 **UNITED STATES DISTRICT COURT**  
 16 **DISTRICT OF NEVADA**

17 CASE NO. 2:21-cv-01611-JCM-VCF

18 IBUUMERANG, LLC, a Texas Limited  
 19 Liability Company

20 Plaintiff,

21 vs.

22 **STIPULATION FOR EXTENSION OF**  
 23 **DEADLINE TO FILE OPPOSITION AND**  
 24 **REPLY TO DEFENDANT PAYVISION**  
 25 **B.V.'S MOTION TO DISMISS**

26 T1 PAYMENTS LLC, a Nevada limited  
 27 liability company; T1 PAYMENTS  
 28 LIMITED, a United Kingdom private limited  
 company; TGLOBAL SERVICES LIMITED,  
 a United Kingdom private limited company;  
 DONALD KASDON, an individual; DEBRA  
 KAREN KING aka DEBRA KAREN  
 KASDON, an individual; AMBER  
 FAIRCHILD, an individual; PAYVISION  
 B.V., a Netherlands limited company;  
 PIXXLES, Ltd., a United Kingdom private  
 limited company and CETLER, a  
 Netherlands limited liability company

Defendants.

1 Plaintiff, Ibuumerang, LLC. (“Ibuumerang”) and Defendant Payvision B.V. (“Payvision”)  
2 hereby stipulate and agree as follows:

3 WHEREAS, Defendant Payvision B.V. filed their FRCP Rule 12(b)(2), 12(b)(6), 9(b) Motion  
4 to Dismiss the First Amended Complaint (the “Motion”)(ECF No. 15) on November 12, 2021.

5 WHEREAS, the deadline for Plaintiff’s opposition is November 29, 2021.

6 WHEREAS, Plaintiff’s counsel is out of the country on a pre-arranged trip until November  
7 30, 2021.

8 WHEREAS, the parties have not stipulated to any prior continuances.

9 WHEREAS, Plaintiff’s counsel and Defendant’s counsel met and conferred via telephone  
10 and agreed to extend the deadline for Plaintiff to file their opposition to December 6, 2021 as long  
11 as the deadline for Defendant to file their reply is extended to December 20, 2021.

12 WHEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between Ibuumerang  
13 and Defendant, through their respective counsel of record that good cause exists to extend the  
14 deadline for Ibuumerang’s opposition from November 29, 2021 to December 6, 2021 and to extend  
15 the deadline for Defendant’s reply from December 13, 2021 to December 20, 2021.

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DATED: November 24, 2021

**SLIGHTING LAW**

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By: /s/ Bradley S. Slighting  
Bradley S. Slighting, Esq.  
Plaintiff,  
Ibuumerang, LLC.

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DATED: November 24, 2021

**WELLMAN & WARREN**

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By: /s/ Scott Wellman  
Scott Wellman, Esq.  
Plaintiff,  
Ibuumerang, LLC.

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DATED: November 24, 2021

**GIIBS GIDEN LOCHER TURNER SENET &  
WITTBRODT**

By:     /s/Richard Edward Haskin      
Richard Edward Haskin, Esq.  
Defendant,  
Payvision B.V.

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**CERTIFICATE OF SERVICE**

I hereby certify, under penalty of perjury, under the laws of the United States of America that on this date, I caused to be electronically filed the foregoing document, and this Certificate of ECF Filing & Service, with the Clerk of the Court using the CM/ECF system, who will send notification of such filing to the following party:

**Attorneys for Defendants**

ARI N. ROTHMAN, VENABLE LLP; [anrothman@venable.com](mailto:anrothman@venable.com)

KORY L. KAPLAN, KAPLAN COTTNER; [kory@kaplancottner.com](mailto:kory@kaplancottner.com)

Attorneys for T1 Payments LLC

RICHARD EDWARD HASKIN, GIIBS GIDEN LOCHER TURNER SENET & WITTBRODT

Nathan D. O'Malley, Peter J. Diedrich, Giorgio A. Sassine, MUSICK, PEELER & GARRETT LLP

Attorneys for PayVision B.V., a Netherlands Limited Company.

DATED this 24th day of November 2021, at Laguna Hills, California.

/s/ Kelsey Schafer

Paralegal

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13 Attorneys for Plaintiff,  
14 IBUUMERANG \_\_\_\_\_

15 **UNITED STATES DISTRICT COURT**  
16 **DISTRICT OF NEVADA**

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18 Liability Company

19 Plaintiff,

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26 DONALD KASDON, an individual; DEBRA  
27 KAREN KING aka DEBRA KAREN  
28 KASDON, an individual; AMBER  
FAIRCHILD, an individual; PAYVISION  
B.V., a Netherlands limited company;  
Pixxles, Ltd., a United Kingdom private  
limited company

Defendants.

Case No. 2:21-cv-01611-JCM-VCF

Judge: Hon. James C. Mahan  
Magistrate Judge: Cam Ferenbach

**ORDER CONTINUING  
DEADLINE TO FILE OPPOSITION AND  
REPLY TO DEFENDANT PAYVISION  
B.V.’S MOTION TO DISMISS**


The Court having received, reviewed, and considered the parties’

1 Stipulation to Continue the deadline to file opposition and reply to Defendant  
2 Payvision B.V.'s Motion to Dismiss.

3 NOW THEREFORE, for good cause shown, the Court hereby APPROVES the  
4 Stipulation to extend Ibuumerang's opposition from November 29, 2021 to December  
5 6, 2021 and to extend the deadline for Defendant's reply from December 13, 2021 to  
6 December 20, 2021.

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8 **SO ORDERED:**

9  
10 Date: November 30, 2021

  
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HON. JAMES C. MAHAN  
UNITED STATES DISTRICT JUDGE

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