

1 MARK J. CONNOT (10010)
 JOHN M. ORR (14251)
 2 **FOX ROTHSCHILD LLP**
 1980 Festival Plaza Drive, Suite 700
 3 Las Vegas, Nevada 89135
 Tel: 702.262.6899
 4 Fax: 702.597.5503
 mconnot@foxrothschild.com
 5 jorr@foxrothschild.com

6 *Attorneys for Defendant Flagship Credit Acceptance LLC*

7 **UNITED STATES DISTRICT COURT**
 8 **DISTRICT OF NEVADA**

9 PAUL JOHN CARR, an individual,

Case No. 2:21-cv-01967-GMN-EJY

10 Plaintiff,

11 v.

**STIPULATION TO EXTEND
 DEADLINE FOR DEFENDANT
 FLAGSHIP CREDIT ACCEPTANCE
 LLC TO RESPOND TO COMPLAINT
 (Second Request)**

12 FLAGSHIP CREDIT ACCEPTANCE LLC; a
 Foreign Limited Liability Company; and
 13 EQUIFAX INFORMATION SERVICES, LLC,
 a Foreign Limited Liability Company,

14 Defendants.

15
 16
 17 DEFENDANT FLAGSHIP CREDIT ACCEPTANCE LLC (“Flagship”) and PLAINTIFF
 18 PAUL JOHN CARR (“Plaintiff”), by and through their undersigned counsel, hereby stipulate and
 19 agree as follows:

20 **RECITALS**

21 WHEREAS on October 26, 2021, Plaintiff filed a Complaint (ECF No. 01), initiating this
 22 action;

23 WHEREAS on November 16, 2021, Flagship executed a Waiver of Service;

24 WHEREAS on December 27, 2021, this Court entered the parties’ Stipulation and Order to
 25 Extend Deadline for Flagship Credit Acceptance LLC to Respond to Complaint (First Request),
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 27
 28

1 without prejudice for further extensions of time by agreement of the parties; and

2 WHEREAS, the parties agree that the deadline for Flagship to respond to the Complaint
3 should be further extended through and including January 24, 2022;

4 **STIPULATION**

5 NOW, THEREFORE, Plaintiff and Flagship hereby stipulate and agree as follows:

6 IT IS STIPULATED AND AGREED that Flagship’s response to Plaintiff’s Complaint
7 (ECF No. 1) is due by no later than January 24, 2022, without prejudice for further extensions of
8 time by agreement of the parties.
9

10 Dated this 7th day of January, 2022.

11 **FOX ROTHSCHILD LLP**
12 *Attorneys for Defendant*
13 *Flagship Credit Acceptance LLC*

COGBURN LAW
Attorneys for Plaintiff
Paul John Carr

14 By: /s/John M. Orr
15 MARK J. CONNOT
16 Nevada Bar No. 10010
17 JOHN M. ORR
18 Nevada Bar. No. 14251
19 1980 Festival Plaza Drive, Suite 700
20 Las Vegas, Nevada 89135
21 Tel: 702.262.6899
22 Fax: 702.597.5503
23 mconnot@foxrothschild.com
24 jorr@foxrothschild.com

By: /s/ Erik W. Fox
JAMIE S. COGBURN
Nevada Bar No. 8409
ERIC W. FOX
Nevada Bar. No. 8804
2580 St. Rose Parkway, Suite 330
Henderson, Nevada 89074Tel:
702.748.7777
Fax: 702.966.3880

25 Gerald E. Arth
26 (*pro hac vice* application forthcoming)
27 Steven J. Daroci
28 (*pro hac vice* application forthcoming)
Fox Rothschild LLP
2000 Market Street, 20th Floor
Philadelphia, Pennsylvania 19103

IT IS SO ORDERED; provided, however, that any future request for an extension must include a specific justification.


U.S. MAGISTRATE JUDGE

Dated: January 7, 2022