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**COUNSEL FOR TRANS UNION LLC**  
 7 **\*\*Designated Attorney for Personal Service\*\***  
 Kurt Bonds, Esq.  
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 9 6605 Grand Montecito Parkway, Suite 200  
 Las Vegas, Nevada 89149

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

13 DANIEL HOLSTEIN,  
 14 Plaintiff,  
 15 v.  
 16 TRANSUNION, LLC, EXPERIAN  
 INFORMATION SOLUTIONS, INC. and  
 AVANT, LLC,  
 17 Defendants.

Case No. 2:21-cv-02199-JAD-VCF  
**JOINT MOTION AND ORDER  
 EXTENDING DEFENDANT TRANS  
 UNION LLC’S TIME TO FILE AN  
 ANSWER OR OTHERWISE RESPOND  
 TO PLAINTIFF’S COMPLAINT  
 (FIRST REQUEST)**

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 21 Plaintiff Daniel Holstein (“Plaintiff”) and Defendant Trans Union LLC (“Trans Union”),  
 22 by and through their respective counsel, file this Joint Motion Extending Defendant Trans Union’s  
 23 Time to File an Answer or Otherwise Respond to Plaintiff’s Complaint.

24 1. On December 14, 2021, Plaintiff filed his Complaint. The current deadline for  
 25 Trans Union to answer or otherwise respond to Plaintiff’s Complaint is January 6, 2022.

26 2. On December 30, 2021, counsel for Trans Union communicated with Plaintiff’s  
 27 counsel via email regarding an extension within which to file a response to the Complaint, and  
 28 Plaintiff’s counsel agreed to the extension.

1 3. The parties will actively discuss a potential early resolution of this case, and the  
2 parties believe an extension of this nature may save waste of the parties' time and expense. The  
3 additional time will allow Plaintiff and Trans Union time to fully explore such early settlement  
4 discussions.

5 4. Moreover, Trans Union's counsel will need additional time to review the  
6 documents and respond to the allegations in Plaintiff's Complaint. This Joint Motion is made in  
7 good faith and not for the purposes of delay.

8 5. Plaintiff has agreed to extend the deadline in which Trans Union has to answer or  
9 otherwise respond to Plaintiff's Complaint up to and including February 7, 2022. This is the first  
10 motion for extension of time for Trans Union to respond to Plaintiff's Complaint.

11 Dated this 6th day of January 2022.

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13 **QUILLING SELANDER LOWNDS  
14 WINSLETT & MOSER, P.C.**

15 */s/ Jennifer Bergh*

16 **JENNIFER BERGH**

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20 **CONTEMPORARY LEGAL SOLUTIONS PLLC**

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22 */s/ Robert M. Tzall*

23 **ROBERT M. TZALL**

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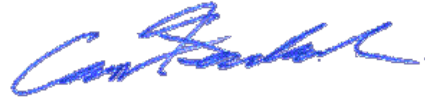
(702) 666-0233

*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 6th day of January 2022.



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**UNITED STATES MAGISTRATE JUDGE**

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**CERTIFICATE OF SERVICE**

I hereby certify that on this the 6th of January 2022, I filed **JOINT MOTION AND ORDER EXTENDING DEFENDANT TRANS UNION LLC'S TIME TO FILE AN ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT** with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following counsel:

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***Counsel for Plaintiff***

*/s/ Jennifer Bergh*  
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**JENNIFER BERGH**