

Shannon G. Splaine, Esq.  
Nevada Bar No. 8241  
LINCOLN, GUSTAFSON & CERCOS LLP  
3960 Howard Hughes Parkway, Suite 200  
Las Vegas, NV 89169-5968  
Tel: (702) 257-1997  
Fax: (702) 257-2203  
E-Mail: [ssplaine@lgclawoffice.com](mailto:ssplaine@lgclawoffice.com)

James K. Schultz, Esq.  
Nevada Bar No. 10219  
SESSIONS ISRAEL & SHARTLE, L.L.P.  
1550 Hotel Circle North, Suite 260  
San Diego, CA 92108  
Tel: (619) 758-1891  
Fax: (877) 334-0661  
E-mail [jschultz@sessions.legal](mailto:jschultz@sessions.legal)  
*Attorney for Defendant Phoenix Financial Services, LLC*

UNITED STATES DISTRICT COURT

## DISTRICT OF NEVADA

Terry McRunnel, ) Case No. 2:22-CV-00004-JCM-VCF  
Plaintiff, )  
vs. ) Joint Stipulation for Extension of Time  
 ) to Respond to Complaint  
Aargon, Inc.; Allied Collection Services, ) Current Response Date: Jan. 10, 2022  
Inc.; Bank of Hawaii; CAC Financial; ) New Response Date: Jan. 18, 2022  
Corelogic; Credco; Factor Trust; Fox )  
Collection Center; Medical Data Systems )  
Inc.; Paragon Revenue Group, Phoenix )  
Financial Services, and Plus Four, Inc., )  
Defendants. )

### Joint Stipulation for Extension of Time

1 It is hereby stipulated by Plaintiff Terry McRunnel and Defendant Phoenix  
2 Financial Services, LLC (“PFS”), through undersigned counsel, that PFS may have  
3 an extension of time to respond to the Complaint from January 10, 2022, through  
4 and until January 18, 2022. This stipulation is made with respect to the following:  
5

6 1. Plaintiff filed this action on November 16, 2021 in the Clark County,  
7 Eighth Judicial District Court.

8 2. Plaintiff served the summons and complaint on PFS on November 22,  
9 2021, making the original response due date December 13, 2021.

10 3. The parties originally agreed to a 21-day extension of time from  
11 December 13, 2021 through January 3, 2022 for PFS to respond to the Complaint.

12 4. On January 3, 2022, this action was removed to the United States  
13 District Court for the District of Nevada making the response due date January 10,  
14 2022.

15 5. Additional time is needed for defense counsel to evaluate the  
16 information necessary to respond to the Complaint. The parties also intend to  
17 discuss potential early resolution of this claim.

18 6. This stipulation is made in good faith and not for any purpose of delay.

19 7. On January 7, 2022, the parties agreed to a short extension of time for  
20 PFS to respond to the Complaint through, and until January 18, 2022.

1 IT IS SO STIPULATED.  
2  
3

Dated: 1/5/2022

KNEPPER & CLARK LLC

4 /s/Miles N. Clark  
5 Miles N. Clark  
6 Attorney for Plaintiff  
7 Terry McRunnel  
8

Dated: 1/5/2022

LINCOLN, GUSTAFSON & CERCOS LLP

9 /s/Shannon G. Splaine  
10 Shannon G. Splaine, Esq.  
11 Attorney for Defendant  
12 Phoenix Financial Services, LLC  
13  
14

IT IS SO ORDERED.

15   
16

17 Cam Ferenbach  
18 United States Magistrate Judge  
19

DATED 1-11-2022