

1 WRIGHT, FINLAY & ZAK, LLP
2 Christina V. Miller, Esq.
3 Nevada Bar No. 12448
4 Ramir M. Hernandez, Esq.
5 Nevada Bar No. 13146
6 7785 W. Sahara Ave., Suite 200
7 Las Vegas, NV 89117
8 (702) 475-7964; Fax: (702) 946-1345
9 rhernandez@wrightlegal.net
10 *Attorneys for Defendant, Berlin-Wheeler, Inc.*

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ELIZABETH WILLIS,

Case No.: 2:22-cv-00609-RFB-DJA

Plaintiff,

**JOINT MOTION TO EXTEND
DEADLINE TO RESPOND TO
PLAINTIFF'S COMPLAINT (FIRST
REQUEST)**

vs.

TRANSUNION, LLC, EQUIFAX
INFORMATION SERVICES, LLC, BERLIN-
WHEELER, INC.,

Defendants.

Plaintiff, Elizabeth Willis (“Plaintiff”), and Defendant, Berlin-Wheeler, Inc. (“Defendant”) (collectively “Parties”), by and through their counsel of record, hereby stipulate and agree as follows:

On April 11, 2022, Plaintiff filed his Complaint [ECF No. 1]. Defendant was served with Plaintiff’s Complaint on April 18, 2022. The deadline for Defendant to respond to Plaintiff’s Complaint is May 9, 2022. The Parties have discussed extending the deadline for Defendant to respond to Plaintiff’s Complaint to allow for better investigation of the allegations and discuss possible resolution of the matter.

WHEREAS, the Parties hereby stipulate and agree to extend the deadline for Defendant to file their responsive pleading to Plaintiff’s Complaint to May 23, 2022.

This is the first motion for an extension of time for Defendant to file their responsive pleading. The extension is requested in good faith and is not for purposes of delay or prejudice to

1 any other party.

2 As part of this motion, Defendant agrees to participate in any Rule 26(f) conference that
3 occurs during the pendency of this extension.

4 DATED this 9th day of May, 2022.

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6 WRIGHT, FINLAY & ZAK, LLP

7 /s/ Ramir M. Hernandez

8 Ramir M. Hernandez, Esq.
9 Nevada Bar No. 13146
10 7785 W. Sahara Ave., Suite 200
11 Las Vegas, NV 89117
12 *Attorneys for Defendant, Berlin-Wheeler, Inc.*

CONTEMPORARY LEGAL SOLUTIONS

13 /s/ Robert M. Tzall

14 Robert M. Tzall, Esq.
15 Nevada Bar No. 13412
16 2551 North Green Valley Pkwy
17 Building C, Suite 303
18 Henderson, NV 89014
19 *Attorneys for Plaintiff, Elizabeth Willis*

20 IT IS SO ORDERED:

21 
22 UNITED STATES MAGISTRATE JUDGE

23 DATED: May 10, 2022

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of WRIGHT, FINLAY & ZAK, LLP and that I served the foregoing **JOINT MOTION TO EXTEND TIME TO RESPOND TO PLAINTIFF'S COMPLAINT (FIRST REQUEST)** on the 9th day of May, 2022, to all parties on the CM/ECF service list.

/s/ Jason Craig
An Employee of WRIGHT, FINLAY & ZAK, LLP