

1 Michael Kind, Esq.
2 Nevada Bar No.: 13903
3 **KIND LAW**
4 8860 South Maryland Parkway, Suite 106
5 Las Vegas, Nevada 89123
6 (702) 337-2322
7 (702) 329-5881 (fax)
8 mk@kindlaw.com
9 *Attorney for Plaintiff Jeremiah Davis*

10

11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 Jeremiah Davis,
14 v.
15 Equifax Information Services, Inc., et
16 al,
17 Defendants.

Case No.: 2:22-cv-00903-JCM-NJK

**Stipulation to extend deadline to file
the discovery plan and scheduling
order
(First request)**

18 Jeremiah Davis (“Plaintiff”) and Equifax Information Services, LLC, Bank of
19 America, N.A., and Chexsystems, Inc. (“Defendants”) (jointly as the “Parties”), by
20 and through their respective counsel, hereby stipulate to extend Local Rule 26-1’s
21 deadlines for the parties to hold their initial Fed. R. Civ. P. 26(f) conference and to
22 file their proposed discovery plan and scheduling order (the “Deadlines”).

23 Good cause exists to extend the Deadlines. The Parties need additional time
24 for counsel to coordinate to set the discovery conference. Additionally, the Parties
25 are engaged in active settlement discussions that may alleviate the need to submit a
26 proposed discovery plan. Therefore, it is appropriate to extend the deadlines for the
27 Parties to file their proposed discovery plan and scheduling order to allow time for
the Parties to meet and confer in compliance with Local Rule 26-1(b).

1 Parties therefore request to extend the Deadlines by 30 days, making the new
2 deadline for the submission of a stipulated discovery plan and scheduling order on
3 **October 17, 2022**. This is the first request for an extension of this deadline.

4 Dated: September 16, 2022.

5 **KIND LAW**

6 /s/ Michael Kind
7 Michael Kind, Esq.
8 8860 South Maryland Parkway, Suite 106
9 Las Vegas, Nevada 89123

10 **FREEDOM LAW FIRM, LLC**

11 /s/ Gerardo Avalos
12 Gerardo Avalos, Esq.
13 8985 South Eastern Ave., Suite 350
14 Las Vegas, NV 89123
15 *Counsel for Plaintiff Jeremiah Davis*

16 **CLARK HILL PLLC**

17 /s/ Gia Marina
18 Gia Marina, Esq.
19 Charles Campbell, Esq.
20 3800 Howard Hughes Drive,
21 Suite 500
22 Las Vegas, Nevada 89169
23 *Counsel for Equifax Information
24 Services, LLC*

25 **WRIGHT, FINLAY & ZAK, LLP**

26 /s/ Jory C. Garabedian
27 Jory C. Garabedian, Esq.
Darren Brenner, Esq.
7785 W. Sahara Ave., Ste. 200
Las Vegas, Nevada 89117
*Counsel for Bank of America, N.A.
and Chex Systems*

19 IT IS SO ORDERED:

20 
21 UNITED STATES MAGISTRATE JUDGE

22 DATED: September 19, 2022