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*Attorneys for Defendant Citibank,
N.A.*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MARY ALBRIGHT,

Plaintiff,

V.

EXPERIAN INFORMATION
SOLUTIONS, INC.; EQUIFAX
INFORMATION SERVICES, LLC;
CITICARDS BANK, N.A.,

Defendants.

CASE NO. 2:22-cv-01271-RFB-EJY

**UNOPPOSED MOTION AND
~~PROPOSED~~ ORDER TO EXTEND TIME
TO RESPOND TO COMPLAINT**

(First Request)

The response of defendant Citibank, N.A. (named as "CitiCards Bank, N.A.") is due November 18, 2022. Citibank has requested, and Plaintiff has agreed, that Citibank has up to and including December 2, 2022, to respond to Plaintiff's complaint to provide additional time for Citibank to investigate Plaintiff's allegations and for Citibank to prepare an adequate responsive pleading.

24 Although Plaintiff's counsel consented to this extension, Citibank's counsel
25 was unable to reach opposing counsel in time to authorize a stipulation and proposed
26 order, which is why this request is styled, instead, as an unopposed motion.
27 However, counsel for Citibank represents that Plaintiff's counsel does not intend to
28 oppose this request. *See Exhibit A, Email between Counsel (proposed settlement*

1 terms redacted). Citibank asserts that there is good cause under Fed. R. Civ. P.
2 6(b)(1) to extend this deadline, given that Citibank's counsel was recently retained
3 and intends to discuss whether early resolution to this case is possible.

4 This is Citibank's first request for extension and is made in good faith and not
5 for purposes of delay.

6 DATED this 18th day of November, 2022.

7 BALLARD SPAHR LLP

8 By: /s/ Andrew S. Clark

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20 **ORDER**

21 IT IS SO ORDERED:

22 
23 Layna J. Zouchal
24 UNITED STATES MAGISTRATE JUDGE

25 DATED: November 21, 2022