

Joel E. Tasca  
Nevada Bar No. 14124  
Andrew S. Clark  
Nevada Bar No. 14854  
BALLARD SPAHR LLP  
1980 Festival Plaza Drive, Suite 900  
Las Vegas, Nevada 89135  
Telephone: (702) 471-7000  
Facsimile: (702) 471-7070  
E-mail: [tasca@ballardspahr.com](mailto:tasca@ballardspahr.com)  
E-mail: [clarkas@ballardspahr.com](mailto:clarkas@ballardspahr.com)

*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.

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

BALLARD SPAHR LLP  
1980 FESTIVAL PLAZA DRIVE, SUITE 900  
LAS VEGAS, NEVADA 89135  
(702) 471-7000 FAX (702) 471-7070

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

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

DATED this 18th day of November, 2022.

BALLARD SPAHR LLP

By: /s/ Andrew S. Clark

Joel E. Tasca

Nevada Bar No. 14124

Andrew S. Clark

Nevada Bar No. 14854

1980 Festival Plaza Drive, Suite 900

Las Vegas, Nevada 89135

*Attorneys for Defendant Citibank, N.A.*

**ORDER**

IT IS SO ORDERED:

  
UNITED STATES MAGISTRATE JUDGE

DATED: November 21, 2022