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11 *Attorneys for Defendant Hyundai Capital America,
12 d/b/a Kia Motors Finance, improperly named as Kia America, Inc.*

13 **UNITED STATES DISTRICT COURT
14 DISTRICT OF NEVADA**

15 Borivoj Saric,
16 Plaintiff,
17 vs.
18 Trans Union, LLC; and Hyundai Capital
19 America, improperly named as Kia America,
20 Inc. dba Kia Motor Finance,
Defendants.

Case No. 2:22-cv-01272-CDS-VCF

21 **DEFENDANT HYUNDAI CAPITAL
22 AMERICA, d/b/a KIA MOTOR
23 FINANCE, improperly named as KIA
24 AMERICA, INC.'S UNOPPOSED
25 MOTION TO EXTEND DEADLINE TO
26 RESPOND TO COMPLAINT**

(FIRST REQUEST)

27 Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), Defendant Hyundai Capital
28 America, d/b/a Kia Motors Finance, improperly named as Kia America, Inc. ("Kia"), through its
attorneys, respectfully requests that the Court extend the deadline in which Kia has to answer or
otherwise plead to Plaintiff's Complaint, through and until September 29, 2022. In support of its
Motion, Kia states as follows:

1. Plaintiff filed the Complaint initiating this action on August 9, 2022. [ECF No. 1].
2. Plaintiff served the Summons and Complaint on Kia effective August 11, 2022. This established an initial deadline for Kia to respond to the Complaint by September 1, 2022. *Id.*
3. Kia's deadline to respond to the Complaint has not yet expired.
4. Kia now respectfully requests that the Court extend Kia's deadline to respond to the Complaint, through and including September 29, 2022.
5. Counsel for Kia discussed the requested extension with counsel for plaintiff Michael Kind, who does not oppose the requested extension.

6. Kia desires additional time to respond to the Complaint in order to investigate the allegations and determine whether early resolution is possible.

7. This is Kia's first request for an extension; this request is brought in good faith and not made to unnecessarily delay discovery or the proceedings in this matter.

8. No party will be prejudiced by the requested extension nor, respectfully, will the extension unduly burden the Court.

9. Granting the requested extension is in the interest of justice and is otherwise right and proper.

WHEREFORE Defendant Hyundai Capital America, d/b/a Kia Motors Finance, improperly named as Kia America, Inc. respectfully requests that the Court grant its Unopposed Motion for Extension of Time to Respond to Complaint, extending its deadline to answer or otherwise plead to Plaintiff's Complaint by and through September 29, 2022, and award such other relief the Court deems just and proper.

DATED this 1st day of September, 2022.

LEWIS ROCA ROTHGERBER CHRISTIE LLP

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*Attorneys for Defendant Hyundai Capital America,
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America, Inc.*

ORDER

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

DATED: 9-19-2022

CERTIFICATE OF SERVICE

I hereby certify that, on September 1, 2022, a true and exact copy of the foregoing has been served upon all parties via CM/ECF.

/s/ Rebecca J. Contla
An employee of Lewis Roca
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