

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

6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 JONALETTE MALLARI,

9 Plaintiff,

10 vs.

11 NATIONAL CONSUMER TELECOM &
12 UTILITIES EXCHANGE, INC., COX
13 COMMUNICATIONS LAS VEGAS, INC.,
14 AT&T SERVICES, INC. AND
15 BACKGROUNDCHECKS.COM LLC,

Defendants.

Case No.: 2:22-cv-01365-CDS-DJA

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

16 Defendant, DIRECTV, LLC (incorrectly named AT&T Services, Inc.) ("Defendant")
17 (collectively "Parties"), by and through its counsel of record, hereby moves as follows:

18 On August 23, 2022, Plaintiff filed his Complaint [ECF No. 1]. Defendant was served with
19 Plaintiff's Complaint on August 25, 2022. The deadline for Defendant to respond to Plaintiff's
20 Complaint is September 15, 2022. The Parties have discussed extending the deadline for Defendant
21 to respond to Plaintiff's Complaint to allow for better investigation of the allegations and discuss
22 possible resolution of the matter. Defendant received consent for an extension via an email dated
23 September 13, 2022, and sent a draft of a Joint Motion to Defendant on September 15, 2022, but
24 Defendant did not receive a response from Plaintiff as to whether Defendant could include
25 Plaintiff's counsel's signature to the joint motion.

26 Therefore, Defendant moves to extend the deadline for Defendant to file its responsive
27 pleading to Plaintiff's Complaint to October 17, 2022.

28 This is the first motion for an extension of time for Defendant to file its responsive

1 pleading. The extension is requested in good faith and is not for purposes of delay or prejudice to
2 any other party.

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

5 DATED this 15th day of September, 2022.

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7 WRIGHT, FINLAY & ZAK, LLP

8 /s/ Ramir M. Hernandez

9 Ramir M. Hernandez, Esq.

10 Nevada Bar No. 13146

11 7785 W. Sahara Ave., Suite 200

12 Las Vegas, NV 89117

13 *Attorneys for Defendant, DIRECTV, LLC*

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16 IT IS SO ORDERED:

17 

18 DANIEL J. ALBREGTS
19 UNITED STATES MAGISTRATE JUDGE

20 DATED: September 16, 2022

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of WRIGHT, FINLAY & ZAK, LLP and that I served the foregoing **UNOPPOSED MOTION TO EXTEND TIME TO RESOND TO PLAINTIFF'S COMPLAINT (FIRST REQUEST)** on the 15th day of September, 2022, to all parties on the CM/ECF service list.

/s/ Jason Craig

An Employee of WRIGHT, FINLAY & ZAK, LLP