

Shannon G. Splaine, Esq.
Nevada Bar No. 8241
LINCOLN, GUSTAFSON & CERCOS LLP
3960 Howard Hughes Parkway, Suite 200
Las Vegas, NV 89169-5968
Tel: (702) 257-1997
Fax: (702) 257-2203
E-Mail: ssplaine@lgclawoffice.com

James K. Schultz, Esq.
Nevada Bar No. 10219
SESSIONS ISRAEL & SHARTLE, L.L.P.
1550 Hotel Circle North, Suite 260
San Diego, CA 92108
Tel: (619) 758-1891
Fax: (877) 334-0661
E-mail jschultz@sessions.legal
Attorneys for Defendant Transworld Systems Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Richard Klein, Raymond Urias and) Case No. 2:22-cv-01392-GMN-BNW
Sandra J. Gunter, individually and on)
behalf of all others similarly situated,) Joint Motion and Order for Extension of
) Time to Respond to First Amended
Plaintiffs,) Complaint
)
vs.) <i>First Request</i>
)
National Collegiate Student Loan Trust) Current Response Date: Jan. 18, 2023
2005-3; National Collegiate Student Loan) New Response Date: Feb. 6, 2023
Trust 2006-3; National Collegiate Student)
Loan Trust 2007-1; National Collegiate)
Student Loan Trust 2007-2; National)
Collegiate Student Loan Trust 200-3;)
<u>National Collegiate Student Loan Trust</u>)

Joint Motion for Extension of Time

2007-4; Pennsylvania Higher Education)
Assistance Agency d/b/a/ American)
Education Services; and Transworld)
Systems Inc.,)
Defendants.)

It is hereby stipulated by Plaintiffs Richard Klein, Raymond Urias and Sandra J. Gunter (“Plaintiffs”) and Defendant Transworld Systems Inc. (“TSI”), through undersigned counsel, that TSI may have an extension of time to respond to the First Amended Complaint from January 18, 2023, through and until February 6, 2023.

This Motion is made with respect to the following:

1. Plaintiff filed the First Amended Complaint adding Transworld Systems Inc. on December 23, 2022 in the United States District Court for the District of Nevada.

2. TSI was served on December 28, 2022, making the original response due date January 18, 2023.

3. Additional time is needed for defense counsel to evaluate the information necessary to respond to the First Amended Complaint.

4. On January 17, 2023, the parties agreed to an extension of time for TSI to respond to the First Amended Complaint through and until February 6, 2023.

1 Granting this request for an extension of time to respond to the Complaint
2 will neither prejudice any party nor unreasonably delay the litigation.
3

4 IT IS SO STIPULATED.

5 Dated: 1/17/2023

FREEDOM LAW FIRM

7 /s/George Haines

8 George Haines

Attorney for Plaintiffs

9 Richard Klein, Raymond Urias and

10 Sandra J. Gunter

11 Dated: 1/17/2023

SESSIONS, ISRAEL & SHARTLE, LLP

12 /s/James K. Schultz

13 James K. Schultz


Attorney for Defendant

14 Transworld Systems Inc.

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17 Pursuant to the Parties' joint Motion, IT IS HEREBY ORDERED:
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19 Defendant shall have an extension of time to and including February 6, 2023,
20 to respond to the First Amended Complaint.
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22 Dated: January 18, 2023


23 United States Magistrate Judge
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