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18 UNITED STATES DISTRICT COURT

19 DISTRICT OF NEVADA

20 Richard Klein, Raymond Urias and) Case No. 2:22-cv-01392-GMN-BNW
21 Sandra J. Gunter, individually and on)
22 behalf of all others similarly situated,) Joint Motion and Order for Extension of
23 Plaintiffs,) Time to Respond to First Amended
24 vs.) Complaint
25)
26 National Collegiate Student Loan Trust) **First Request**
27 2005-3; National Collegiate Student Loan)
28 Trust 2006-3; National Collegiate Student) Current Response Date: Jan. 18, 2023
29 Loan Trust 2007-1; National Collegiate) New Response Date: Feb. 6, 2023
30 Student Loan Trust 2007-2; National)
31 Collegiate Student Loan Trust 200-3;)
32 National Collegiate Student Loan Trust)
33

Joint Motion for Extension of Time

1 2007-4; Pennsylvania Higher Education)
2 Assistance Agency d/b/a/ American)
3 Education Services; and Transworld)
4 Systems Inc.,)
5)
6 Defendants.)
7)
8

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

13 This Motion is made with respect to the following:

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

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

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

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

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

IT IS SO STIPULATED.

Dated: 1/17/2023

FREEDOM LAW FIRM

/s/George Haines

George Haines

Attorney for Plaintiffs

Richard Klein, Raymond Urias and

Sandra J. Gunter

Dated: 1/17/2023

SESSIONS, ISRAEL & SHARTLE, LLP

/s/James K. Schultz

James K. Schultz

Attorney for Defendant

Transworld Systems Inc.

Pursuant to the Parties' joint Motion, IT IS HEREBY ORDERED:

Defendant shall have an extension of time to and including February 6, 2023, to respond to the First Amended Complaint.

Dated: January 18, 2023

Brensweden
United States Magistrate Judge