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11 Attorneys for Defendant American  
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12  
 13 UNITED STATES DISTRICT COURT  
 14 DISTRICT OF NEVADA

15 JENNAFER AYCOCK,  
 16 Plaintiff,

17 vs.

18 AMERICAN EXPRESS NATIONAL  
 BANK; and EXPERIAN  
 19 INFORMATION SOLUTIONS, INC.,  
 20 Defendants.

Case No. 2:23-cv-00292-CDS-EJY

**AMENDED JOINT STIPULATION  
 TO EXTEND DEADLINE FOR  
 AMERICAN EXPRESS TO  
 RESPOND TO PLAINTIFF’S  
 MOTION TO COMPEL  
 DISCOVERY RESPONSES AND  
 SUPPLEMENTAL DISCLOSURES**

**(FOURTH REQUEST)**

23 Plaintiff Jennafer Aycock (“Plaintiff”) and defendant American Express  
 24 National Bank (“American Express”) (collectively, the “Parties”), through their

1 respective attorneys of record, hereby submit their Joint Stipulation to extend time  
2 to respond to Plaintiff's Motion to Compel Discovery Responses and Supplemental  
3 Disclosures (ECF No. 52) (the "Motion"), and in support thereof state as follows:

4 1. On October 17, 2024, Plaintiff filed the Motion.

5 2. On October 31, 2024, American Express filed a Stipulation and  
6 Order extending American Express' deadline to respond to the Motion by eleven  
7 (11) days and Plaintiff's reply by seven (7) days. (ECF No. 53)

8 3. On November 8, 2024, American Express filed a second  
9 Stipulation and Order further extending American Express' deadline to respond to  
10 the Motion by seven (7) days and Plaintiff's reply by seven (7) days.

11 4. On November 15, 2024, American Express filed a third  
12 Stipulation and Order further extending American Express' deadline to respond to  
13 the Motion by seven (7) days and Plaintiff's reply by seven (7) days.

14 5. American Express's deadline to respond to the Motion is  
15 currently November 25, 2024.

16 6. Plaintiff's reply in support of the Motion is currently due  
17 December 9, 2024.

18 7. The Parties have agreed to extend the time for American  
19 Express to respond to the Motion by nine (9) days, up to and including December  
20 4, 2024, with a reciprocal extension of nine (9) days to the deadline for Plaintiff to  
21 file a Reply Brief, up to and including December 18, 2024.

22 8. Good cause exists for granting this extension because the  
23 parties require additional time to facilitate resolution of this matter conserve  
24

1 judicial resources. The parties have engaged in extensive settlement negotiations  
2 and the matter appears close to resolution.

3 9. This extension is sought in good faith and not for the purpose of  
4 delay.

5 10. No party will be prejudiced by the relief sought herein.

6 THEREFORE, IT IS HEREBY STIPULATED that the time for  
7 American Express to respond to the Motion be extended by nine (9) days, up to  
8 and including December 4, 2024, with a reciprocal extension of nine (9) days to  
9 the deadline for Plaintiff to file a Reply Brief, up to and including December 18,  
10 2024.

11 KAZEROUNI LAW GROUP, APC

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12 /s/ Gustavo Ponce

/s/ Alice Kwak

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**ORDER**

IT IS SO ORDERED.

  
UNITED STATES DISTRICT JUDGE

DATED: November 26, 2024