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6 *Counsel for Defendant*

7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 KEVIN MEAGHER on behalf of himself and
REBECCA DAWSON on behalf of
11 themselves and all other similarly situated
individuals,
12
13 Plaintiffs,
14
15 v.
16 KTC HOLDING COMPANY f/k/a THE
KINGDOM TRUST COMPANY,
17
18 Defendant.

CASE NO. 2:24-cv-01630-CDS-MDC
**STIPULATION AND PROPOSED ORDER
TO EXTEND TIME TO RESPOND TO
COMPLAINT**
(FIRST REQUEST)

17 Plaintiffs KEVIN MEAGHER, on behalf of himself and on behalf of others
18 similarly situation, and REBECCA DAWSON (“Plaintiffs”), and Defendant KTC
19 HOLDING COMPANY, formerly known as THE KINGDOM TRUST COMPANY
20 (“Defendant”), by and through their respective counsel, and pursuant to Local Rules IA 6-
21 1, LR IA 6-2, and LR 7-1, hereby stipulate and agree as follows:

22 WHEREAS, Plaintiffs filed their complaint on September 4, 2024 (ECF No. 1);

23 WHEREAS, waiver of service executed on behalf of Defendant was filed on
24 September 10, 2024 (ECF No. 7), making the deadline to respond to the complaint
25 November 9, 2024;

26 WHEREAS, Plaintiffs filed their First Amended Complaint on November 8, 2024
27 (ECF No. 13), making the deadline to respond to the amended complaint November 25,
28

1 2024;

2 WHEREAS, Plaintiffs have agreed to an extension of time for Defendant to
3 respond to the amended complaint, namely, January 17, 2025, to allow the Parties to
4 continue ongoing settlement discussions and to accommodate the extension request by
5 Defendant's counsel;

6 NOW, THEREFORE, in consideration of the foregoing, the Parties hereby
7 STIPULATE and AGREE that the deadline for Defendant to respond to the amended
8 complaint is January 17, 2025.

9 The Parties represent this stipulation is made in good faith and not for the purposes
10 of delay.

11 **IT IS SO STIPULATED.**

12 Dated this 21st day of November, 2024.

Dated this 21st day of November, 2024.

13
14 /s/ Eric W. Swanis

/s/ Kennedy M. Brian

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25 *Counsel for Plaintiffs*

26 **IT IS SO ORDERED.**

27 _____
Hon. Maximiliano D. Couvillier III
United States Magistrate Judge
28 DATED: 11/25/2024