

1 KAEMPFER CROWELL
 Robert McCoy, No. 9121
 2 Sihomara L. Graves, No. 13239
 1980 Festival Plaza Drive, Suite 650
 3 Las Vegas, Nevada 89135
 Telephone: (702) 792-7000
 4 Facsimile: (702) 796-7181
 Email: rmccoy@kcnvlaw.com
 5 Email: sgraves@kcnvlaw.com

6 STEPTOE LLP
 Stephen J. Newman (*pro hac vice forthcoming*)
 7 Alice Kwak (*pro hac vice forthcoming*)
 2029 Century Park East, Suite 980
 8 Los Angeles, California 90067
 Telephone: (213) 439-9400
 9 Email: snewman@steptoe.com
 Email: akwak@steptoe.com

10 Attorneys for Defendant American
 11 Express National Bank

12 UNITED STATES DISTRICT COURT
 13 DISTRICT OF NEVADA

14 KELLY RADKOWSKI,

15 Plaintiff,

16 vs.

17 EQUIFAX INFORMATION SERVICES
 18 LLC; EXPERIAN INFORMATION
 SOLUTIONS, INC.; CLARITY
 19 SERVICES, INC.; AMERICAN
 EXPRESS, INC.; and CLARK
 20 COUNTY CREDIT UNION,

21 Defendants.

Case No. 2:24-cv-02283-JCM-MDC

**STIPULATION AND ORDER TO
 EXTEND DEADLINE TO RESPOND
 (FIRST REQUEST)**

22 Plaintiff Kelly Radkowski and American Express National Bank,
 23 erroneously sued as American Express, Inc. (“American Express”), stipulate that
 24

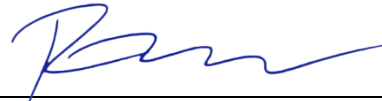
1 the deadline for American Express to respond to the complaint (ECF No. 1) be
2 extended for 30 days from January 8, 2025 until February 7, 2025.

3 This is the first extension sought in connection with this deadline and
4 is requested to permit the parties time to investigate the allegations and assess the
5 possibility of settlement.

6 FREEDOM LAW FIRM, LLC

KAEMPFER CROWELL

7 /s/ George Haines



8 George Haines, No. 9411
9 Gerardo Avalos, No. 15171
8985 S. Eastern Avenue, Suite 100
Las Vegas, Nevada 89123

Robert McCoy, No. 9121
Sihomara L. Graves, No. 13239
1980 Festival Plaza Drive, Suite 650
Las Vegas, Nevada 89135

10 Attorneys for Plaintiff
11 Kelly Radkowski

STEPTOE LLP
Stephen J. Newman (*PHV forthcoming*)
Alice Kwak (*PHV forthcoming*)
2029 Century Park East, Suite 980
Los Angeles, California 90067

Attorneys for Defendant American
Express National Bank

16 **ORDER**

17 IT IS SO ORDERED.

18
19 United States Magistrate Judge

20 DATED: 1-3-25