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7 *Counsel for Discover Bank*

8 UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10 Ma Olivia Abad,

11 Plaintiff,

12 vs.

13 Equifax Information Services LLC;
 Experian Information Solutions, Inc.;
 14 JPMorgan Chase Bank, N.A.; Citibank,
 N.A.; Synchrony Financial; Capital One
 15 Bank, National Association; Bank of
 America Corporation; American Express,
 16 Inc.; and Discover Bank.

17 Defendants.

Case No. : 2:25-cv-00090-CDS-NJK

Joint Motion to Extend Time to Respond to Complaint

Second Request

18 Defendant Discover Bank’s (“Discover”) response to plaintiff Ma Olivia Abad’s
 19 complaint is due March 5, 2025. Discover has requested, and plaintiff has agreed,
 20 that Discover have up to and including March 12, 2025, to respond to plaintiff’s
 21 complaint. There is good cause for the extension. Since the parties’ first extension,
 22 Discover completed its initial investigation of the allegations in plaintiff’s complaint,
 23 consulted with its attorney about its findings, engaged in settlement discussions with
 24 plaintiff, and—to that end—informally exchanged documents with plaintiff.
 25 However, the parties were unable to reach a settlement. Therefore, Discover has
 26 requested a final extension during which the parties will either resolve their dispute
 27 or, to avoid further delay, Discover will respond to plaintiff’s complaint.

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1 This is the second request for an extension, and it is not sought for the purposes
2 of delay.

3 **BALLARD SPAHR LLP**

Freedom Law Firm, LLC

4 By: /s/ David E. Chavez

By: /s/ Gerardo Avalos

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Counsel for plaintiff Olivia Ma Abad

10
11 **ORDER**

12 **NO FURTHER EXTENSIONS OF THIS**
13 **DEADLINE WILL BE GRANTED.**

IT IS SO ORDERED:

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15 _____
United States Magistrate Judge

16 DATED: March 6, 2025
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