

Noah Kane, Esq.
Consumer Attorneys PLLC
68-29 Main Street
Flushing, NY 11367
518-375-3963
Fax: 718-715-1750
Email: e-service@consumerattorneys.com

Attorneys for Plaintiff Valerie Piskorowski

James J. Lee, Esq.
Nevada Bar No. 001909
Legal Offices of James J. Lee
2620 Regatta Dr. #102
Las Vegas, NV 89102
702-664-6545
Fax: 702-946-1115
Email: james@leelitigate.com

Attorneys for Defendant The Bank of Missouri

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

VALERIE PISKOROWSKI,

Plaintiff,

v.

EXPERIAN INFORMATION
SOLUTIONS, INC., EQUIFAX
INFORMATION SERVICES, LLC,
TRANS UNION LLC, AND THE
BANK OF MISSOURI,

Defendants.

Case No.: 2:25-cv-00122-JCM-DJA

**JOINT MOTION FOR EXTENSION OF
TIME FOR DEFENDANT THE BANK OF
MISSOURI TO RESPOND TO
COMPLAINT**

SECOND REQUEST

Defendant The Bank of Missouri ("TBOM") has requested a second extension of time to answer, move or otherwise respond to the Complaint of Plaintiff Valerie Piskorowski ("Plaintiff" and together with TBOM, the "Parties"), to which Plaintiff has no opposition. Accordingly, by this joint motion, IT IS HEREBY STIPULATED AND AGREED to by and among counsel, that Defendant The Bank of Missouri's time to

1 answer, move or otherwise respond to the Complaint in this action is extended from
2 March 5, 2025 through and including **March 19, 2025**.

3 Good cause exists for the request. TBOM is still in the process of compiling,
4 reviewing, and evaluating its business records and other files related to the allegations
5 and claims in the Complaint. TBOM has requested this second extension so it has
6 sufficient time to complete those tasks before responding to the Complaint, and Plaintiff
7 approves. The Parties are also engaged in discussions regarding the action, including
8 issues related to the arbitrability of certain claims. This second extension will provide the
9 Parties with additional time to continue their discussions regarding the matter and the
10 potential for a resolution of the claims early in the case.

11 This joint motion is filed in good faith and not for the purposes of delay. This is
12 the second request for an extension of this deadline.

13 TBOM has not waived any objection to the venue or jurisdiction of the Court over
14 the person of TBOM, or any other challenge to Plaintiff's complaint or other pleadings
15 filed in this case.

16 Respectfully submitted, this 5th day of March, 2025.

17 **Consumer Attorneys PLLC**

18
19 /s/ Noah Kane
20 Noah Kane, Esq.
21 68-29 Main Street
22 Flushing, NY 11367
23 *Attorneys for Plaintiff Valerie Piskorowski*

24 **Legal Offices of James J. Lee**

25 /s/ James J. Lee
26 James J. Lee, Esq.
27 2620 Regatta Dr. #102
28 Las Vegas, NV 89102
Attorneys for Defendant The Bank of Missouri

ORDER

IT IS SO ORDERED that the parties' joint motion (ECF No. 26) is GRANTED. The Bank of Missouri shall have until **March 19, 2025** to respond to the complaint.



DANIEL J. ALBRECHTS
UNITED STATES MAGISTRATE JUDGE

DATED: 3/6/2025