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9 *Attorneys for Defendant*
Discover Bank

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11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 Clark McKinlay,

14 Plaintiff,

15 vs.

16 DISCOVER BANK; U.S. BANK, N.A.;
17 EQUIFAX INFORMATION SERVICES,
LLC; EXPERIAN INFORMATION
SOLUTIONS, INC.; TRANS UNION
18 LLC

19 Defendants.

20 Case No. : 2:25-cv-00281-GMN-DJA

21 **JOINT MOTION AND ORDER TO**
EXTEND DEFENDANT DISCOVER
BANK'S DEADLINE TO RESPOND TO
PLAINTIFF'S COMPLAINT

22 **(First Request)**

23 Pursuant to LR IA 6-1(a) and LR IA 6-2, the undersigned counsel of record for
24 Defendant Discover Bank (“Discover”) and Plaintiff Clark McKinlay submit this Joint
Motion to extend Discover’s deadline to file its response to Plaintiff’s Complaint (ECF
No. 1) by two weeks, from March 14, 2025 to Friday March 21, 2025.

25 Discover and Plaintiff make this first request for extension to extend the
26 deadline to answer Plaintiff’s Complaint in good faith and not for the purpose of delay.
27 No party will be prejudiced by this extension, as the purpose of this first request for
28 extension is to allow additional time for Discover to investigate the claims and, if

1 appropriate, explore settlement. This is the first request for an enlargement of time
2 for Discover to respond to the Complaint.

3 Dated this 3rd day of March, 2025.

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6 By: /s/ Abran E. Vigil
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LAW OFFICE OF KEVIN L. HERNANDEZ

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10 *Attorney for Plaintiff Clark McKinlay*

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15 **ORDER**

16 IT IS SO ORDERED:

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19 United States District Magistrate Judge

20 DATED: March 5, 2025

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