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STIPULATION

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UNITED STATES DISTRICT COURT **DISTRICT OF NEVADA**

Michelle M. Bays,	Case No.: 3:16-cv-00656-HDM-WGC ORDER GRANTING
Plaintiff, v.	Stipulation for Extension of Time to Respond to Pending Motions
Frontier Financial Credit Union, Experian Information Solutions, Inc. and Trans Union LLC, Defendants.	

Plaintiff Michelle M. Bays ("Plaintiff") and Defendant Frontier Financial Credit Union ("Defendant") (jointly as the "Parties"), by and through counsel, stipulate for a 14 day extension of time for Plaintiff to respond to Defendant's

Motion to Dismiss, ECF No. 22, and Motion to Abstain, ECF No. 23. Defendant filed its motions on December 2, 2016.

Plaintiff has requested in good faith and not for the purpose of delay, and Defendant agrees, for an additional 14 days to file oppositions to the motions because of the upcoming holidays and counsel's schedule. This is the first request for an extension of this deadline.

THEREFORE, it is hereby stipulated by the Parties as follows:

- (1) Plaintiff shall respond to Defendant's Motion to Dismiss for Lack of Subject Matter Jurisdiction, ECF No. 22, on or before **January 2, 2017**; and
- (2) Plaintiff shall respond to Defendant's Motion to Abstain, ECF No. 23, on or before **January 2, 2017**.

DATED this 19th day of December 2016. KAZEROUNI LAW GROUP, APC

By: <u>/s/ Michael Kind</u>
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7854 W. Sahara Avenue
Las Vegas, NV 89117
Attorney for Plaintiff

MICHAEL LEHNERS

By: <u>/s/ Michael Lehners</u>
Michael Lehners, Esq.
429 Marsh Ave.
Reno, Nevada 89509
Attorney for Defendant Frontier Financial Credit Union

IT IS SO ORDERED:

UNITED STATES DISTRICT JUDGE

Howard DMEKiller

DATED: _December 20, 2016

CERTIFICATE OF SERVICE

I HEREBY CERTIFY pursuant to Rule 5 of the Federal Rules of Civil Procedure that on December 19, 2016, the foregoing Stipulation for Extension of Time to Respond to Pending Motions was filed and served via CM/ECF on all parties appearing in this case.

KAZEROUNI LAW GROUP, APC

By: <u>/s/ Michael Kind</u>
Michael Kind
7854 W. Sahara Avenue
Las Vegas, NV 89117

STIPULATION Case No.: 3:16-cv-00656-HDM-WGC