Case 3:17-cv-00513-MMD-VPC Document 21 Filed 11/08/17 Page 1 of 3

GAYLE A. KERN, ESQ. Nevada Bar No. 1620 2 KAREN M. AYARBE, ESQ. Nevada Bar No. 3358 KERN & ASSOCIATES, LTD. 5421 Kietzke Lane, Ste. 200 Reno, Nevada 89511 Tel: (775) 324-5930 Fax: (775) 324-6173 Email: karenayarbe@kernltd.com 7 Attorneys for Defendant Gayle A. Kern, Ltd. dba Kern & Associates, Ltd. 8 9 10 11 12 13 Plaintiff. 14 vs. 15

FILED RECEIVED **ENTERED** SERVED ON COUNSEL/PARTIES OF RECORD NOV 2 9 2017 **CLERK US DISTRICT COURT** DISTRICT OF NEVADA **DEPUTY** BY:

# UNITED STATES DISTRICT COURT **DISTRICT OF NEVADA**

WELLS FARGO FINANCIAL NEVADA 2, INC., a Nevada Corporation;

DEBORAH LOGAN, an individual; DANIEL LOGAN, individual; **EAGLE** an HIGHLANDS OWNERS ASSOCIATION, a Nevada non-profit corporation; and GAYLE A. KERN, LTD., a Nevada professional corporation, d/b/a Kern & Associates, Ltd.

Defendants.

Case No.: 3:17-cv-00513-MMD-VPC

STIPULATION AND ORDER TO EXTEND DEADLINE FOR GAYLE A. KERN, LTD. **DBA** KERN ASSOCIATES, LTD. TO ANSWER OR RESPOND TO **OTHERWISE COMPLAINT** 

[First Request]

IT IS HEREBY STIPULATED between Plaintiff, Wells Fargo Financial Nevada 2, Inc., a Nevada Corporation ("Plaintiff"), by and through its counsel, Snell & Wilmer LLP, and Defendant, Gayle A. Kern, Ltd. dba Kern & Associates, Ltd. ("Kern"), by and through its counsel Kern & Associates, Ltd., to extend the deadline for Kern to answer or otherwise respond to Plaintiff's Complaint on or before December 1, 2017.

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### Case 3:17-cv-00513-MMD-VPC Document 21 Filed 11/08/17 Page 2 of 3

Plaintiff filed its Complaint on or about August 24, 2017, and Kern was served on or about October 18, 2017. The deadline for Kern to answer or otherwise respond to the Complaint is on or about November 8, 2017.

Plaintiff and Kern (collectively referred to as the "Parties") stipulate and agree to extend the deadline for Kern's answer or other response to the Complaint on or before December 1, 2017. The Parties are engaged in substantive discussions with regard to the claims and defenses in this matter, and wish to conserve the time and resources of the Parties and the Court while such discussions are ongoing. Therefore, good cause exists for the extension. This is the first request for an extension of time with respect to this matter and is not intended to cause delay or prejudice to any party.

DATED this 8th day of November, 2017.

DATED this 8th day of November, 2017.

## KERN & ASSOCIATES, LTD.

/s/ Karen M. Ayarbe, Esq.

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Attorneys for Defendant Gayle A. Kern,

Ltd. dba Kern & Associates, Ltd.

### SNELL & WILMER, LLP

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Attorneys for Plaintiff Wells Fargo Financial

Nevada 2, Inc., a Nevada Corporation

#### **ORDER**

IT IS SO ORDERED.

DATED this 24 day of November 2017.

United States Magistrate Judge

Respectfully Submitted By:

/s/ Karen M. Ayarbe, Esq.

KAREN M. AYARBE, ESQ.

Attorneys for Defendant Gayle A. Kern, Ltd. dba Kern & Associates, Ltd.

Case 3:17-cv-00513-MMD-VPC Document 21 Filed 11/08/17 Page 3 of 3

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#### **CERTIFICATE OF SERVICE**

Pursuant to the Fed. R. Civ. Proc. 5(b) and the United States District Court CM/ECF Electronic Filing Procedure IV(B), a true and correct copy of the foregoing STIPULATION AND ORDER TO EXTEND DEADLINE FOR GAYLE A. KERN, LTD. DBA KERN & ASSOCIATES, LTD. TO ANSWER OR OTHERWISE RESPOND TO COMPLAINT (First Request) was transmitted electronically through the Court's e-filing electronic system to the attorney(s) associated with this case.

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/s/ Christine A. Lamia

An Employee of Kern & Associates, Ltd.