



CanTERS Deli Las Vegas LLC et al v. Banc of America Merchant Services, LLC et al

2018 | Cited 0 times | E.D. Pennsylvania | November 28, 2018

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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA CANTERS DELI LAS VEGAS LLC, a citizen of the state of California; and CANTERS DELI TIVOLI VILLAGE LLC, a citizen of the State of California,

Plaintiffs, v. BANC OF AMERICA MERCHANT SERVICES, LLC, a citizen of the States of Delaware and Georgia; BANK OF AMERICA, N.A., a citizen of the State of North Carolina; FREEDOMPAY, INC., a citizen of the States of Delaware and Pennsylvania; and DOES 1 through 10,

Defendants.

CASE NO.: 2:18-cv-01908-KJD-NJK STIPULATION AND [PROPOSED] ORDER TO EXTEND RESPONSE AND REPLY DEADLINES IN CONNECTION WITH DEFENDANT FREEDOMPAY, INC.'S MOTION TO DISMISS OR, IN THE ALTERNATIVE, TO TRANSFER VENUE TO THE EASTERN DISTRICT OF PENNSYLVANIA [FIRST REQUEST]

Plaintiffs CANTERS DELI LAS VEGAS LLC and CANTERS DELI TIVOLI VILLAGE LLC (together, "CanTERS"), and Defendant FREEDOMPAY, INC. ("FreedomPay"), by and through their undersigned counsel of record, hereby stipulate and agree to extend the response and reply deadlines in connection with Defendant FreedomPay, Inc.'s Motion To Dismiss or, in the Alternative, to Transfer Venue to the Eastern District of Pennsylvania filed on November 8, 2018 (Motion to Dismiss"), as follows:

WHEREAS, the current deadline for CanTERS to file a response to FreedomPay's Motion to Dismiss is



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November 26, 2018.

WHEREAS, on November 21, 2018, given that Canters' response deadline immediately

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follows the Thanksgiving holiday, counsel for Canters and FreedomPay conferred and reached an agreement to extend the deadline for Canters to file and serve a response to FreedomPay's Motion to Dismiss up to and including December 3, 2018. The parties have also agreed to extend FreedomPay's reply deadline through December 10, 2018. This is the parties' first request for an extension of time.

THEREFORE, in consideration of the foregoing, the parties request that the Court modify the briefing schedule, as follows:

1. That the deadline for Canters to file a response to FreedomPay's Motion to Dismiss is extended up to and including December 3, 2018; and
2. That the deadline for FreedomPay to file a reply in support of FreedomPay's Motion to Dismiss is extended up to and including December 10, 2018.

DATED this 21 st

day of November, 2018 DATED this 21 st

day of November, 2018 BROWNSTEIN HYATT FARBER SCHRECK, LLP By: /s/ Adam K. Bult

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IT IS SO ORDERED: _____ UNITED STATES DISTRICT
JUDGE Dated: _____ Case 2:19-cv-03030-MSG Document 18 Filed



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