UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

KAITLYN ROSE SLAUGHTER,

Plaintiff,

v.

LEXISNEXIS RISK SOLUTIONS INC.,

Defendant.

Case No. 1:23-cv-02566-CNS-SKC

JOINT STIPULATION FOR EXTENSION OF TIME FOR DEFENDANT LEXISNEXIS RISK SOLUTIONS INC. TO RESPOND TO PLAINTIFF'S COMPLAINT

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A) and District of Colorado Local Civil Rule 6.1, Plaintiff Kaitlyn Rose Slaughter and Defendant LexisNexis Risk Solutions Inc. ("LexisNexis Risk"), by and through their respective counsel, hereby stipulate as follows:

WHEREAS, Plaintiff filed the above-captioned action against LexisNexis Risk on October 2, 2023 (the "Complaint") (*see* Compl., ECF No. 1);

WHEREAS, Plaintiff effectuated service on LexisNexis Risk on October 16, 2023;

WHEREAS, pursuant to Rule 12(a) of the Federal Rules of Civil Procedure, LexisNexis Risk's responsive pleading is due on November 6, 2023;

WHEREAS, D.C.COLO.LCivR. 6.1(a) provides that "[t]he parties may stipulate in writing to one extension of not more than 21 days beyond the time limits prescribed by the Federal Rules of Civil Procedure to respond to a pleading or amended pleading, interrogatories, requests for production of documents, or requests for admissions. The stipulation must be filed before the expiration of the time limits to respond prescribed in the Federal Rules of Civil Procedure and

shall be effective on filing, unless otherwise ordered.";

WHEREAS, pursuant to D.C.COLO.LCivR. 6.1, Plaintiff and LexisNexis Risk agree to extend LexisNexis Risk's time to respond to Plaintiff's Complaint by twenty-one (21) days, through and including November 27, 2023;

WHEREAS, on October 25, 2023, counsel for LexisNexis Risk conferred with counsel for Plaintiff, who agreed to the 21-day extension to allow LexisNexis Risk time to secure local counsel and to locate documents that would allow it to meaningfully respond to Plaintiff's Complaint;

WHEREAS, this is the first request for an extension by the parties;

WHEREAS, this request is made in good faith and not for any improper purpose, and this extension would not prejudice any party to the litigation;

WHEREAS, pursuant to D.C.COLO.LCivR. 6.1(c), counsel for LexisNexis Risk certifies that a copy of this stipulation is served on the client; and

WHEREAS, by entering into this Stipulation, LexisNexis Risk does not waive, and specifically preserves, any and all defenses available to it under Federal Rule of Civil Procedure Rule 12 and otherwise;

NOW THEREFORE, IT IS HEREBY STIPULATED by and between Plaintiff and LexisNexis Risk, through their respective attorneys of record, that LexisNexis Risk may respond to the Complaint on or before **November 27, 2023**.

Respectfully submitted this 1st day of November, 2023.

/s/ Nicole K. Serfoss
Nicole K. Serfoss, CO Bar #36815
MORRISON & FOERSTER LLP
4200 Republic Plaza
370 Seventeenth Street
Denver, CO 80202-5638
P: 303-592-1500
F: 303-592-1510
nserfoss@mofo.com

Attorney for Defendant
LexisNexis Risk Solutions Inc.

/s/ James Ristvedt
James Ristvedt, AZ Bar #035938
CONSUMER ATTORNEYS
8245 N. 85th Way
Scottsdale, AZ 85258
T: 480-626-1956
jristvedt@consumerattorneys.com

Attorney for Plaintiff
Kaitlyn Rose Slaughter

CERTIFICATE OF SERVICE

This is to certify that on November 1, 2023, I electronically filed the foregoing pleading with the Clerk of the Court using the CM/ECF system which will automatically send an email notification of such filing to all attorneys of record.

/s/Nicole K. Serfoss
Nicole K. Serfoss

Attorney for Defendant
LexisNexis Risk Solutions Inc.