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7 UNITED STATES DISTRICT COURT

8 DISTRICT OF NEVADA

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10 ***IN RE: MGM RESORTS INTERNATIONAL***  
11 ***DATA BREACH LITIGATION***

Master File No. 2:20-cv-00376- JAD-NJK

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13 **This Document Relates To: All Cases**

ECF No. 51

14 **ORDER GRANTING**  
15 **STIPULATION FOR EXTENSION OF TIME TO FILE CONSOLIDATED COMPLAINT**  
16 **AND TO SET SCHEDULE FOR RULE 23(g) MOTIONS**  
17 **(First Request)**

18 Pursuant to LR IA 6-1, Plaintiffs in the above-captioned Consolidated Action and Defendant  
19 MGM Resorts International (“MGM” or “Defendant”), (collectively, the “Parties”), by and through  
20 their counsel of record, stipulate to an extension of time for Plaintiffs to file a Consolidated Complaint  
21 and to a schedule for counsel for Plaintiffs to file motions for leadership pursuant to Rule 23(g),  
22 Federal Rule of Civil Procedure. This is the first request made to extend the deadline for filing a  
23 consolidated complaint. In support of this Stipulation, the Parties show as follows:

24 On March 30, 2020, the Court entered its Order granting the Parties’ Stipulation to Consolidate  
25 Actions and Set Scheduling Deadlines. (ECF No. 22.) The Order set a deadline for the filing of  
26 Plaintiffs’ Consolidated Complaint for thirty (30) days after entry of the Order, which yielded a  
27 deadline of April 29, 2020.

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STIPULATION FOR EXTENSION OF TIME TO  
FILE CONSOLIDATED COMPLAINT  
(FIRST REQUEST)

1           When the Parties entered into the Stipulation, the Plaintiffs had been collaborating and believed  
2 they could self-organize a leadership structure for the litigation. Unfortunately, despite working  
3 together and reaching consensus on many issues, the Plaintiffs have been unable to reach an agreement  
4 on a leadership structure. While taking no position on the appointment of interim lead counsel, the  
5 Defendant agrees that interim lead counsel should be appointed for purposes of filing a consolidated  
6 complaint and efficiently coordinating and conducting pretrial proceedings in this matter.

7           Accordingly, the Parties propose, subject to Court approval, the following initial deadlines:

- 8           • Any attorney who has filed an action in this litigation may file an application for  
9           appointment as interim class counsel or other designated counsel either individually or  
10           as part of a proposed leadership structure. All applications must be e-filed in the Master  
11           File No. 2:20-cv-00376-JAD-NJK, no later than 5 p.m. Pacific Time on May 1, 2020.  
12           No responses shall be filed. The Court may hold a hearing on the applications or appoint  
13           interim counsel or other designated counsel based on timely written submissions only;
- 14           • Plaintiffs shall file a Consolidated Complaint no later than sixty (60) days following  
15           the entry of an order appointing interim class counsel or other designated counsel;
- 16           • Given the complexity of the issues, including Plaintiffs' stated desire to assert claims  
17           under the laws of multiple states, the parties agree to the following briefing schedule  
18           and expanded page limitations with respect to MGM's response to the Consolidated  
19           Complaint:
  - 20           ○ Any response to the Consolidated Complaint shall be due within sixty (60) days  
21           from the filing of the Consolidated Complaint and shall be limited to fifty (50)  
22           pages
  - 23           ○ Any opposition thereto will be due within sixty (60) days of the filing of such  
24           response(s) and shall be limited to fifty (50) pages
  - 25           ○ Any reply brief will be due within forty-five (45) days of the filing of any  
26           opposition and shall be limited to twenty-five (25) pages


- Plaintiffs agree that by entering into this stipulation or acting in conformance with its terms, MGM has not waived or acted in any way inconsistent with any right, remedy or defense.

**\*\* ORDER \*\***

**IT IS SO STIPULATED.**

Based on the parties' stipulation [51] and good cause appearing, IT IS SO ORDERED

Dated: April 28, 2020

  
 U.S. District Judge Jennifer A. Dorsey  
 Dated: April 30, 2020, nunc pro tunc to  
 April 29, 2020.

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