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14 [*Additional counsel listed on Signature Page*]

15 **UNITED STATES DISTRICT COURT**
 16 **DISTRICT OF NEVADA**

17 RICHARD GIBSON, and HERIBERTO
 18 VALIENTE,

19 Plaintiffs,

20 v.

21 MGM RESORTS INTERNATIONAL,
 22 CENDYN GROUP, LLC, THE RAINMAKER
 GROUP UNLIMITED, INC., CAESARS
 23 ENTERTAINMENT INC., TREASURE
 ISLAND, LLC, WYNN RESORTS HOLDINGS,
 24 LLC,

25 Defendants.

Case No. 2:23-cv-00140-MMD-DJA

**STIPULATION AND ~~PROPOSED~~
 ORDER TO EXTEND DEADLINE TO
 FILE THE PROPOSED DISCOVERY
 PLAN**

(FIRST REQUEST)

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 27
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STIPULATION

1
2 Plaintiffs Richard Gibson and Heriberto Valiente (“Plaintiffs”) and Defendants Cendyn
3 Group, LLC (“Cendyn”), the Rainmaker Group Unlimited, Inc. (“Rainmaker”), Caesars
4 Entertainment, Inc. (“Caesars”), Treasure Island, LLC (“Treasure Island”), Wynn Resorts
5 Holdings, LLC (“Wynn”), and MGM Resorts International (“MGM”) (together, “Defendants”)
6 (collectively, Plaintiffs and Defendants are referred to herein as the “Parties”), by and through their
7 respective counsel, for good cause shown, hereby stipulate and agree to extend LR 26-1’s deadline
8 for the Parties to file their proposed discovery plan and scheduling order for the following reasons:

- 9
- 10 1. Defendants filed their Joint Motion to Dismiss the Complaint on March 27, 2023. (ECF
11 No. 91). The same day, Defendant MGM filed a separate Motion to Dismiss. (ECF No.
12 92.)
 - 13 2. Thereafter, on April 24, 2023, the Parties met and conferred in accordance with Federal
14 Rule of Civil Procedure 26(f) and LR 26-1.
 - 15 3. Pursuant to LR 26-1, the Parties’ discovery plan and scheduling order is currently due
16 on May 8, 2023.
 - 17 4. This Stipulation and amended briefing schedule has been entered into because
18 Defendants have determined that they need additional time to continue the meet and
19 confer process and prepare a discovery plan and scheduling order in accordance with the
20 Local Rules, and Plaintiffs, as a professional courtesy and given the complex nature of
21 the case, do not oppose this extension.

22
23 Accordingly, the Parties now hereby stipulate and agree, and respectfully request that the
24 Court order, as follows:

- 25 1. The deadline for the Parties to file a Rule 26(f) proposed discovery plan and scheduling
26 order is extended to and including Monday, May 15, 2023.
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- 2. This stipulation is filed in good faith and not intended to cause delay, but rather, to provide the Parties with sufficient time to work through various discovery plan issues in this multi-party class action.
- 3. Nothing in this stipulation is intended in any way to waive or affect the rights, claims, defenses, objections, or arguments that any party may have with respect to any matter, other than those expressly addressed and agreed herein.

ORDER

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: May 5th, 2023

1 Dated: May 4, 2023

Respectfully submitted,

2 /s/ Rahul Ravipudi

/s/ Steve W. Berman

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