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 16 [*Additional counsel listed on Signature Page*]

17 **UNITED STATES DISTRICT COURT**

18 **DISTRICT OF NEVADA**

19 RICHARD GIBSON, and HERIBERTO
 20 VALIENTE,

21 Plaintiffs,

22 v.

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

27 Defendants.
 28

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

**STIPULATION AND ~~[PROPOSED]~~
 ORDER TO EXTEND DEADLINE TO
 FILE REPLIES IN SUPPORT OF
 DEFENDANTS' MOTIONS TO STAY
 DISCOVERY**

(FIRST REQUEST)

STIPULATION

1
2 Plaintiffs Richard Gibson and Heriberto Valiente (together, “Plaintiffs”) and Defendants
3 Cendyn Group, LLC, the Rainmaker Group Unlimited, Inc., Caesars Entertainment, Inc., Treasure
4 Island, LLC, and Wynn Resorts Holdings, LLC, and MGM Resorts International (“MGM”)
5 (together, “Defendants”) (Plaintiffs and Defendants collectively, the “Parties”), by and through their
6 counsel, hereby stipulate and agree to extend Local Rule 7-2(b)’s deadline for Defendants to file
7 replies in support of Certain Defendants’ Motion to Partially Stay Discovery, ECF No. 114, and
8 MGM’s Joinder to Certain Defendants’ Joint Motion to Stay Discovery and Motion to Stay
9 Discovery, ECF No. 116 (together, “Motions to Stay”) for the following reasons.

- 10 1. Defendants filed their Motions to Stay on May 22, 2023.
- 11 2. Plaintiffs’ Oppositions to Defendants’ Motions to Stay, ECF Nos. 119 & 120, were filed
12 on June 5, 2023.
- 13 3. Pursuant to Local Rule 7-2(b), Defendants’ replies in support of their Motions to Stay
14 are due on Monday, June 12, 2023.
- 15 4. The Parties’ [Proposed] Discovery Plan and Scheduling Order, ECF No. 111, was filed
16 on May 15, 2023 and is pending before this Court. The Parties agreed to extend the
17 briefing schedule for replies in support of Defendants’ Motions to Stay for a period of
18 one week, to June 19, 2023, as stated on page 10 of the Parties’ [Proposed] Discovery
19 Plan and Scheduling Order, ECF No. 111.

20 Accordingly, the Parties hereby stipulate and agree, and respectfully request that the Court
21 order, as follows:

- 22 1. The deadline for Defendants’ replies in support of their Motions to Stay is extended to
23 and including, Monday, June 19, 2023.
- 24 2. This stipulation is filed in good faith and not intended to cause delay, but rather to provide
25 Defendants sufficient time to prepare and file their replies in support of their Motions to
26 Stay in this multi-party putative class action.

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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.

1 Dated: June 8, 2023

2 /s/ Steve W. Berman

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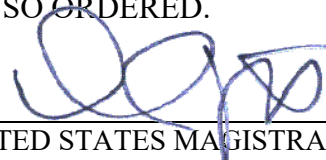
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11 **IT IS THEREFORE ORDERED** that the parties' stipulation (ECF No. 121) is **GRANTED**.

12
13 Given the parties' explanation that they agreed to extend the briefing schedule in their proposed
14 discovery plan and scheduling order, the Court reminds the parties that "[f]or each type of relief
15 requested or purpose of the document, a separate document must be filed and a separate event
16 must be selected for that document." Nevada Local Rule IC 2-2(b).

17 IT IS SO ORDERED.



18 UNITED STATES MAGISTRATE JUDGE

19 DATED: June 8, 2023

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that service of the foregoing **STIPULATION AND [PROPOSED] ORDER TO EXTEND DEADLINE TO FILE REPLIES IN SUPPORT OF DEFENDANTS' MOTIONS TO STAY DISCOVERY** was served on the 8th day of June, 2023 via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list.

/s/ J. Colby Williams
An employee of Campbell & Williams