

1 HOWARD & HOWARD ATTORNEYS PLLC  
 2 W. WEST ALLEN (NV Bar No. 5566)  
 3 3800 Howard Hughes Parkway, Suite 1000  
 4 Las Vegas, NV 89169  
 Telephone: 702.667.4843  
 Facsimile: 702.567.1568  
 wwa@h2law.com

GIBSON, DUNN & CRUTCHER LLP  
 SAMUEL G. LIVERSIDGE  
*(pro hac vice forthcoming)*  
 JAY P. SRINIVASAN  
*(pro hac vice forthcoming)*  
 S. CHRISTOPHER WHITTAKER  
*(pro hac vice forthcoming)*  
 333 South Grand Avenue  
 Los Angeles, CA 90071-3197  
 Telephone: 213.229.7000  
 Facsimile: 213.229.7520  
 sliversidge@gibsondunn.com  
 jsrinivasan@gibsondunn.com  
 cwhittaker@gibsondunn.com

SKADDEN, ARPS, SLATE, MEAGHER &  
 FLOM LLP  
 BORIS BERSHTEYN  
*(pro hac vice forthcoming)*  
 KAREN HOFFMAN LENT  
*(pro hac vice forthcoming)*  
 One Manhattan West  
 New York, NY 10001-8602  
 Telephone: 212.735.3000  
 Facsimile: 917.777.2000

*Attorneys for Defendant*  
 PIONEER NATURAL RESOURCES COMPANY

*[Additional Attorneys Listed In Signature Block]*

**IN THE UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF NEVADA**

DANIEL ROSENBAUM; RENELDO  
 RODRIGUEZ; and THOMAS CARON,  
 Individually and on Behalf of All Others  
 Similarly Situated,

Plaintiffs,

v.

PERMIAN RESOURCES CORP. f/k/a  
 CENTENNIAL RESOURCE  
 DEVELOPMENT, INC.; CHESAPEAKE  
 ENERGY CORPORATION;  
 CONTINENTAL RESOURCES INC.;  
 DIAMONDBACK ENERGY, INC.; EOG  
 RESOURCES, INC.; HESS  
 CORPORATION; OCCIDENTAL  
 PETROLEUM CORPORATION; and  
 PIONEER NATURAL RESOURCES  
 COMPANY,

Defendants.

CASE NO. 2:24-cv-00103-GMN-MDC

**STIPULATION AND ORDER TO  
 EXTEND TIME FOR DEFENDANTS TO  
 RESPOND TO THE COMPLAINT**

**(FIRST REQUEST)**

1 IT IS HEREBY STIPULATED AND AGREED between Plaintiffs Daniel Rosenbaum,  
2 Reneldo Rodriguez, and Thomas Caron (together, “Plaintiffs”) and all Defendants in this action,  
3 Permian Resources Corp. f/k/a Centennial Resource Development, Inc., Chesapeake Energy  
4 Corporation, Continental Resources Inc., Diamondback Energy, Inc., EOG Resources, Inc., Hess  
5 Corporation, Occidental Petroleum Corporation, Pioneer Natural Resources Company (together,  
6 “Defendants”)<sup>1</sup>, by and through their respective counsel and pending the Court’s approval, that  
7 Defendants shall have an additional 60 days to answer or otherwise respond to the Complaint (ECF  
8 No. 1). Defendants’ original response deadline is February 7, 2024. With an additional 60 days,  
9 Defendants’ deadline to answer or otherwise respond to the Complaint is extended to April 8,  
10 2024.

11 Good cause exists for the extension set forth herein.

12 *First*, eight defendants have been named in this action. Defense counsel were only recently  
13 retained, and they require additional time to organize themselves, meet and confer with plaintiffs,  
14 and streamline any potential motions that may be presented to the Court.

15 *Second*, three additional, related actions have been filed against Defendants in this  
16 District.<sup>2</sup> Additional time is warranted so that the parties and the Court may determine whether  
17 and which of the other actions filed against Defendants in this District should be coordinated with  
18 this action.

19 *Third*, the interests of efficiency would be served by allowing the parties sufficient time to  
20 meet and confer on a reasonable approach and briefing schedule for any motions to be presented

---

21  
22 <sup>1</sup> By entering into this stipulation, none of the Defendants are waiving any of their potential  
23 defenses or arguments to this action, including but not limited to those related to personal  
jurisdiction and venue.

24 <sup>2</sup> On January 22, 2024, a complaint was filed against Defendants in *Andrew Caplen Installations*  
25 *LLC et al. v. Permian Resources Corp. et al.*, No. 2:24-cv-00150-JCM-DJA; on January 24, 2024,  
26 a complaint was filed against Defendants in *These Paws Were Made for Walkin’ LLC v. Permian*  
27 *Resources Corp. et al.*, No. 2:24-cv-00164-GMN-NJK; and on January 29, 2024, a complaint was  
28 filed against Defendants in *Courtmanche et al. v Permian Resources Corp. et al.*, No. 2:24-cv-  
00198. Two notices of related cases have been filed in the instant action (ECF Nos. 20, 23), and  
a notice of related cases in each: *Andrew Caplen Installations* (ECF No. 10), *These Paws Were*  
*Made for Walkin’* (ECF No. 5), and *Courtmanche* (ECF No.10). The parties have indicated they  
would be amenable to proceeding on this schedule in the event the cases are coordinated for pretrial  
proceedings.

1 to the Court in these actions, with the goal of minimizing the number of filings and avoiding  
2 duplication.

3 This is the first extension requested for Defendants to respond to the Complaint and is not  
4 made for the purpose of delay.

5 Dated: January 31, 2024

Dated: January 31, 2024

6 HOWARD & HOWARD ATTORNEYS PLLC  
7 W. WEST ALLEN (NV Bar No. 5566)

MORRIS, SULLIVAN & LEMKUL, LLP

8  
9 By: /s/ W. West Allen  
W. West Allen

By: /s/ Christopher A. Turtzo  
Christopher A. Turtzo; NV Bar No. 10253  
3960 Howard Hughes Parkway, Suite 400  
Las Vegas, NV 89169  
Tel: (702) 405-8100  
Fax: (702) 405-8101  
turtzo@morrissullivanlaw.com

10 GIBSON, DUNN & CRUTCHER LLP  
11 Samuel G. Liversidge (*pro hac vice forthcoming*)  
12 Jay P. Srinivasan (*pro hac vice forthcoming*)  
13 S. Christopher Whittaker (*pro hac vice  
forthcoming*)

*Local Counsel for Plaintiffs*

14 SKADDEN, ARPS, SLATE, MEAGHER &  
15 FLOM LLP  
16 Boris Bershteyn (*pro hac vice forthcoming*)  
17 Karen Hoffman Lent (*pro hac vice forthcoming*)

SCOTT+SCOTT ATTORNEYS AT LAW  
LLP  
Patrick J. Coughlin (*pro hac vice  
forthcoming*)  
Carmen Medici (*pro hac vice*)  
Fatima Brizuela (*pro hac vice*)  
Daniel J. Brockwell (*pro hac vice*)  
600 W. Broadway, Suite 3300  
San Diego, CA 92101  
Tel: (619) 233-4565  
pcoughlin@scott-scott.com  
cmedici@scott-scott.com  
fbrizuela@scott-scott.com  
dbrockwell@scott-scott.com

18 *Attorneys for Defendant*  
19 PIONEER NATURAL RESOURCES COMPANY

20 Dated: January 31, 2024

By: /s/ E. Leif Reid

21 E. Leif Reid  
22 LEWIS ROCA LLP  
23 3993 Howard Hughes Parkway, Suite 600  
24 Las Vegas, NV 89169  
Tel: (775) 321-3415  
lreid@lewisroca.com

SCOTT+SCOTT ATTORNEYS AT LAW  
LLP  
Patrick McGahan (*pro hac vice*)  
Michael Srodoski (*pro hac vice  
forthcoming*)  
Isabella De Lisi (*pro hac vice*)  
156 S Main Street  
P.O. Box 192  
Colchester, CT 06415  
Tel: (860) 537-5537  
pmcgahan@scott-scott.com

25 Jeffrey L. Kessler (*pro hac vice forthcoming*)  
26 Jeffrey J. Amato (*pro hac vice forthcoming*)  
27 WINSTON & STRAWN LLP  
28 200 Park Avenue  
New York, New York 10166  
Tel: (212) 294-6700  
jkessler@winston.com

1 jamato@winston.com

msrodoski@scott-scott.com  
idelisi@scott-scott.com

2 Thomas M. Melsheimer (*pro hac vice*  
3 *forthcoming*)  
4 Thomas B. Walsh, IV (*pro hac vice forthcoming*)  
5 WINSTON & STRAWN LLP  
6 2121 N. Pearl Street, Suite 900  
7 Dallas, TX 75201  
8 Tel: (212) 294-6700  
9 tmelsheimer@winston.com  
10 twalsh@winston.com

SCOTT+SCOTT ATTORNEYS AT LAW  
LLP  
Patrick Rodriguez (*pro hac vice*  
*forthcoming*)  
230 Park Ave., 17th Floor  
New York, NY 11069  
Tel: (212) 223-6444  
prodriguez@scott-scott.com

*Counsel for Plaintiffs*

11 *Attorneys for Defendant*  
12 *DIAMONDBACK ENERGY, INC.*

13 Dated: January 31, 2024

14 By: /s/ J. Colby Williams  
15 J. Colby Williams, Esq.

16 CAMPBELL & WILLIAMS  
17 J. COLBY WILLIAMS, ESQ. (5549)  
18 PHILIP R. ERWIN, ESQ. (11563)  
19 710 South Seventh Street, Suite A  
20 Las Vegas, Nevada 89101  
21 Telephone: (702) 382-5222  
22 jcw@cwlawlv.com  
23 pre@cwlawlv.com

24 LATHAM & WATKINS LLP

25 MARGUERITE M. SULLIVAN (*pro hac vice*  
26 *forthcoming*)  
27 JASON D. CRUISE (*pro hac vice forthcoming*)  
28 555 Eleventh Street, N.W., Suite 1000  
Washington, D.C. 20004  
Telephone: (202) 637-2200  
Marguerite.Sullivan@lw.com  
Jason.Cruise@lw.com

LAWRENCE E. BUTERMAN (*pro hac vice*  
*forthcoming*)  
1271 Avenue of the Americas  
New York, NY 10020  
Telephone: (212) 906-1200  
Lawrence.Buterman@lw.com

1  
2 *Attorneys for Defendant*  
3 *CHESAPEAKE ENERGY CORPORATION*

4 Dated: January 31, 2024

5 HOLLEY DRIGGS LTD  
6 NICHOLAS J. SANTORO (NV Bar No. 532)  
7 F. THOMAS EDWARDS (NV Bar No. 9549)

8 By: /s/ Nicholas J. Santoro  
9 Nicholas J. Santoro

10 WACHTELL, LIPTON, ROSEN & KATZ  
11 Kevin S. Schwartz (*pro hac vice forthcoming*)  
12 David A. Papirnik (*pro hac vice forthcoming*)

13 *Attorneys for Defendant*  
14 *HESS CORPORATION*

15 Dated: January 31, 2024

16 By: /s/ Devora W. Allon  
17 Devora W. Allon

18 Devora W. Allon (*pro hac vice forthcoming*)  
19 KIRKLAND & ELLIS LLP  
20 601 Lexington Avenue  
21 New York, NY 10022  
22 devora.allon@kirkland.com  
23 Telephone: 212-446-5967  
24 Facsimile: 212-446-4900

25 Jeffrey J. Zeiger (*pro hac vice forthcoming*)  
26 KIRKLAND & ELLIS LLP  
27 300 North LaSalle  
28 Chicago, IL 60654  
jzeiger@kirkland.com  
Telephone: 312-862-3237  
Facsimile: 312-862-2200

Akhil K. Gola (*pro hac vice forthcoming*)  
KIRKLAND & ELLIS LLP  
1301 Pennsylvania Avenue, N.W.

1 Washington, D.C. 20004  
2 akhil.gola@kirkland.com  
3 Telephone: 202-389-3256  
4 Facsimile: 202-389-5200

5 *Attorneys for Defendant*  
6 *OCCIDENTAL PETROLEUM CORPORATION*

7 Dated: January 31, 2024

8 By: /s/ Christopher E. Ondeck  
9 Christopher E. Ondeck

10 PROSKAUER ROSE LLP  
11 CHRISTOPHER E. ONDECK (*pro hac vice*  
12 *forthcoming*)  
13 STEPHEN R. CHUK (*pro hac vice forthcoming*)  
14 1001 PENNSYLVANIA AVENUE NW  
15 WASHINGTON, DC 20004  
16 TELEPHONE: (202) 416-6800  
17 condeck@proskauer.com  
18 schuk@proskauer.com

19 KYLE A. CASAZZA (*pro hac vice*  
20 *forthcoming*)  
21 2029 CENTURY PARK EAST, SUITE 2400  
22 LOS ANGELES, CA 90067-3010  
23 TELEPHONE: (310) 284-5677  
24 kcasazza@proskauer.com

25 WHITTEN BURRAGE  
26 MICHAEL BURRAGE (*pro hac vice*  
27 *forthcoming*)  
28 512 NORTH BROADWAY AVENUE, STE 300  
OKLAHOMA CITY, OK 73102  
TELEPHONE: (888) 783-0351  
mburrage@whittenburragelaw.com

*Attorneys for Defendant*  
*CONTINENTAL RESOURCES, INC.*

Dated: January 31, 2024

McDONALD CARANO LLP  
KRISTEN T. GALLAGHER (NV Bar No. 9561)

1  
2 By: /s/ Kristen t. Gallagher  
3 Kristen T. Gallagher  
4 2300 West Sahara Ave., Suite 1200  
5 Las Vegas, NV 89102  
6 kgallagher@mcdonaldcarano.com

7  
8 VINSON & ELKINS LLP  
9 Michael W. Scarborough (*pro hac vice*  
10 *forthcoming*)  
11 Dylan I. Ballard (*pro hac vice forthcoming*)  
12 555 Mission Street, Suite 2000  
13 San Francisco, CA 94105  
14 Telephone: (415) 979-6900  
15 Facsimile: (415) 651-8786  
16 mscarborough@velaw.com  
17 dballard@velaw.com

18  
19 Craig P. Seebald (*pro hac vice forthcoming*)  
20 Adam L. Hudes (*pro hac vice forthcoming*)  
21 Stephen M. Medlock (*pro hac vice forthcoming*)  
22 2200 Pennsylvania Avenue NW  
23 Suite 500 West  
24 Washington, DC 20037  
25 Telephone: (202) 639-6500  
26 Facsimile: (202) 639-6604  
27 cseebald@velaw.com  
28 ahudes@velaw.com  
smedlock@velaw.com

*Attorneys for Defendant*  
*PERMIAN RESOURCES CORPORATION*

Dated: January 31, 2024

22 By: /s/ John M. Taladay  
23 John M. Taladay (*pro hac vice forthcoming*)  
24 Christopher Wilson (*pro hac vice forthcoming*)  
25 Kelsey Paine (*pro hac vice forthcoming*)  
26 Megan Tankel (*pro hac vice forthcoming*)  
27 BAKER BOTTS L.L.P.  
28 700 K Street N.W.  
Washington, D.C. 20001-5692  
Phone (202) 639-7909  
Fax (202) 639-1165  
john.taladay@bakerbotts.com  
christopher.wilson@bakerbotts.com  
kelsey.paine@bakerbotts.com

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

megan.tankel@bakerbotts.com

*Counsel for Defendant  
EOG RESOURCES, INC.*

PISANELLI BICE PLLC

By: /s/ James J. Pisanelli

James J. Pisanelli, Esq., #4027  
Debra L. Spinelli, Esq., #9695  
400 South 7th Street, Suite 300  
Las Vegas, Nevada 89101

*Local Counsel for Defendant  
EOG RESOURCES, INC.*

**IT IS SO ORDERED:**



---

Maximiliano D. Courfillier III  
United States Magistrate Judge

Dated: 2-1-2024