

1 KATHLEEN BLISS, ESQ.
 Nevada Bar No. 7606
 2 KATHLEEN BLISS LAW, PLLC
 170 South Green Valley Parkway
 3 Suite 300
 Henderson, NV 89012
 4 Telephone: (702) 318-7375

5 MILAN CHATTERJEE, ESQ.
 Nevada Bar No. 15159
 Milan@MilansLegal.com
 7 MILAN'S LEGAL
 3172 N. Rainbow Blvd, #1406
 Las Vegas, NV 89108
 9 Telephone: (702) 381-2875
 Attorneys for Lynn Thompson

<input checked="" type="checkbox"/>	FILED	<input type="checkbox"/>	RECEIVED
<input type="checkbox"/>	ENTERED	<input type="checkbox"/>	SERVED ON
COUNSEL/PARTIES OF RECORD			
<div style="border: 1px solid black; padding: 5px; width: fit-content; margin: 0 auto;"> <p>JAN 9, 2024</p> </div>			
CLERK US DISTRICT COURT DISTRICT OF NEVADA			
BY: _____		DEPUTY	

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

14 LYNN THOMPSON,
 15
 16 Plaintiff,
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 18 vs.
 19
 20 TESLA MOTORS, INC; ONQGLOBAL,
 INC.; DOES 1-15,
 21 Defendants.

CASE NO.: 3:21-cv-00238-HDM-CSD

**ORDER GRANTING STIPULATION AND
 ORDER TO EXTEND DISPOSITIVE
 MOTION DEADLINE**

(Third Request)

22 Plaintiff LYNN THOMPSON, by and through his attorneys of record Milan Chatterjee,
 23 Esq. and Kathleen Bliss, Esq., Defendant TESLA MOTORS, INC., by and through its attorney of
 24 record Joshua Sliker, Esq., and Defendant ONQGLOBAL, INC., by and through its attorney of
 25 record Wade Beavers, Esq., stipulate to extending the current deadline for dispositive motions
 26 from January 12, 2024 to **January 23, 2024**, due to the scheduling of a Settlement Conference for
 27 January 16, 2024. This stipulation is based on LR IA 6-1 and LR 26-3.

1 Pursuant to LR IA 6-1, the parties recite that this is the third stipulation to extend the
2 dispositive motion deadline in this case. The current January 12, 2024 dispositive motion
3 deadline was set by order dated September 1, 2023 (*see* ECF No. 113) following substitution of
4 Plaintiff's counsel in this matter. Subsequent thereto, the Court scheduled a mandatory settlement
5 conference in this case to occur January 16, 2024. *See* ECF No. 119 (Court's December 6, 2023
6 *Order Scheduling Video Settlement Conference*).

7 Pursuant to LR 26-3, the parties submit that good cause exists to continue the dispositive
8 motions deadline for a limited eleven (11) day period so that the parties may conserve resources
9 and expenses and focus energy on preparing for the January 16, 2024 mandatory settlement
10 conference. The current dispositive motion deadline falls four (4) days before the settlement
11 conference. The parties are asking that the new deadline fall seven (7) after the settlement
12 conference. In the event this matter is resolved at the conference, the need for dispositive motions
13 would be obviated and the parties would be saved the associated expense.

14 The parties are mindful of the existing trial date in this matter of May 21, 2024 (*see* ECF
15 No. 115 Minute Order setting trial), however they do not believe that the limited extension sought
16 herein will interfere with the parties' ability to complete full briefing of dispositive motions and
17 submit the same to the Court for decision well before the April 17, 2024 calendar call in this
18 matter (*see id.*).

19 Based on the foregoing, the parties respectfully submit that good cause exists to grant the
20 requested limited extension and continue the deadline for dispositive motions from January 12,
21 2024 to **January 23, 2024**.

22 ///

23 ///

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1 **IT IS SO STIPULATED.**

2 Dated this 8th day of January, 2024.

3 **MILAN'S LEGAL**

4
5 /s/ Milan Chatterjee, Esq.
6 **MILAN CHATTERJEE, ESQ.**
7 Nevada Bar No. 15159
8 3172 N. Rainbow Blvd., 1406
9 Las Vegas, NV 89108
10 Tel: (702) 381-2875
11 Email: Milan@MilansLegal.com
12 *Attorney for Lynn Thompson*

Dated this 8th day of January, 2024.

FENNEMORE CRAIG, P.C.

/s/ Wade Beavers, Esq.
WADE BEAVERS, ESQ.
Nevada Bar No. 13451
7800 Rancharrah Parkway
Reno, NV 89511
Tel: (775) 788-2208
Email: WBeavers@fennemorelaw.com
Attorney for OnQGlobal, Inc.

11 Dated this 8th day of January, 2024.

12 **JACKSON LEWIS, P.C.**

13
14 /s/ Joshua A. Sliker, Esq.
15 **JOSHUA A. SLIKER, ESQ.**
16 Nevada Bar No. 12493
17 300 S. Fourth Street
18 Suite 900
19 Las Vegas, NV 89101
20 Tel: (702) 921-2460
21 Email: Joshua.Sliker@jacksonlewis.com
22 *Attorney for Tesla Motors, Inc.*

ORDER

Good cause appearing,

IT IS SO ORDERED.

DATED this 9th day of January _____, 2023.

23
24
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UNITED STATES MAGISTRATE JUDGE

Subject: RE: Dispositive Motions Deadline - Thompson v. Tesla, et al.
Date: Monday, January 8, 2024 at 6:19:40 PM Pacific Standard Time
From: Sliker, Joshua A. (Las Vegas)
To: Beavers, Wade, Milan Chatterjee
CC: Pierce, Shannon, Kathleen Bliss
Attachments: image005.png, image006.png, image331647.png

These additions are fine with me.



Joshua A. Sliker (He/Him)

Attorney at Law

Jackson Lewis P.C.

300 S. Fourth Street
Suite 900

Las Vegas, NV 89101

Direct: (702) 921-2486 | Main: (702) 921-2460

Joshua.Sliker@Jacksonlewis.com | www.jacksonlewis.com

From: Beavers, Wade <WBeavers@fennemorelaw.com>
Sent: Monday, January 8, 2024 6:01 PM
To: Sliker, Joshua A. (Las Vegas) <Joshua.Sliker@Jacksonlewis.com>; Milan Chatterjee <milan@milanslegal.com>
Cc: Pierce, Shannon <SPierce@fennemorelaw.com>; Kathleen Bliss <kb@kathleenblisslaw.com>
Subject: RE: Dispositive Motions Deadline - Thompson v. Tesla, et al.

Thanks, Milan. I think the Court will want us to include the form language set forth in LR IA 6-1 as well as a short paragraph detailing why the settlement conference creates "good cause" for the alteration of the deadline as required in LR 26-3. See my requested revisions in the attached.

Wade

Wade Beavers, Director
T: 775.788.2208 | F: 775.788.2283
wbeavers@fennemorelaw.com

From: Sliker, Joshua A. (Las Vegas) <Joshua.Sliker@Jacksonlewis.com>
Sent: Monday, January 8, 2024 5:49 PM
To: Milan Chatterjee <milan@milanslegal.com>; Beavers, Wade <WBeavers@fennemorelaw.com>
Cc: Pierce, Shannon <SPierce@fennemorelaw.com>; Kathleen Bliss <kb@kathleenblisslaw.com>
Subject: RE: Dispositive Motions Deadline - Thompson v. Tesla, et al.

Hi Milan,

You have permission to affix my e-signature to the stipulation.

Thanks.

Josh



Joshua A. Sliker (He/Him)

Attorney at Law

Jackson Lewis P.C.

300 S. Fourth Street
Suite 900

Las Vegas, NV 89101

Direct: (702) 921-2486 | Main: (702) 921-2460

Joshua.Sliker@Jacksonlewis.com | www.jacksonlewis.com

From: Milan Chatterjee <milan@milanslegal.com>

Sent: Monday, January 8, 2024 5:30 PM

To: Beavers, Wade <WBeavers@fennemorelaw.com>

Cc: Pierce, Shannon <SPierce@fennemorelaw.com>; Sliker, Joshua A. (Las Vegas) <Joshua.Sliker@Jacksonlewis.com>; Kathleen Bliss <kb@kathleenblisslaw.com>

Subject: Re: Dispositive Motions Deadline - Thompson v. Tesla, et al.

Please see the attached Stipulation and Order. Please let us know if we can use your signature and file.
Thanks.

Best regards,
Milan Chatterjee, Esq.
Founder & Managing Member



- - - - -
Phone Number: 1 (702) 381-2875
Licensed in California, Nevada, and New York
Texas Bar Admission Pending
Website: MilansLegal.com

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From: Beavers, Wade <WBeavers@fennemorelaw.com>
Date: Monday, January 8, 2024 at 1:48 PM
To: Milan Chatterjee <milan@milanslegal.com>
Cc: Pierce, Shannon <SPierce@fennemorelaw.com>, Sliker, Joshua A. (Las Vegas) <Joshua.Sliker@jacksonlewis.com>, Kathleen Bliss <kb@kathleenblisslaw.com>
Subject: RE: Dispositive Motions Deadline - Thompson v. Tesla, et al.

Milan,

Let us know if we should expect to look for a draft stipulation from your office in relation to the dispositive motion deadline.

Sincere thanks,

Wade

From: Sliker, Joshua A. (Las Vegas) <Joshua.Sliker@Jacksonlewis.com>
Sent: Friday, January 5, 2024 11:57 PM
To: Kathleen Bliss <kb@kathleenblisslaw.com>; Beavers, Wade <WBeavers@fennemorelaw.com>
Cc: Milan Chatterjee <milan@milanslegal.com>; Pierce, Shannon <SPierce@fennemorelaw.com>
Subject: RE: Dispositive Motions Deadline - Thompson v. Tesla, et al.

[Tesla agrees to the extension as well.](#)



Joshua A. Sliker (He/Him)

Attorney at Law

Jackson Lewis P.C.

300 S. Fourth Street
Suite 900

Las Vegas, NV 89101

Direct: (702) 921-2486 | Main: (702) 921-2460

Joshua.Sliker@Jacksonlewis.com | www.jacksonlewis.com

From: Kathleen Bliss <kb@kathleenblisslaw.com>
Sent: Friday, January 5, 2024 8:05 AM
To: Beavers, Wade <WBeavers@fennemorelaw.com>
Cc: Milan Chatterjee <milan@milanslegal.com>; Sliker, Joshua A. (Las Vegas) <Joshua.Sliker@Jacksonlewis.com>; Pierce, Shannon <SPierce@fennemorelaw.com>
Subject: Re: Dispositive Motions Deadline - Thompson v. Tesla, et al.

Thanks, Wade.
Sent from my iPhone

On Jan 5, 2024, at 7:45 AM, Beavers, Wade <WBeavers@fennemorelaw.com> wrote:

Wade Beavers, Director
T: 775.788.2208 | F: 775.788.2283
wbeavers@fennemorelaw.com

Milan,

For OnQ, we would stipulate to the extension you propose below.

Wade

Wade Beavers
Director

<[0.png](#)>

7800 Rancharrah Pkwy, Reno, NV 89511
T: 775.788.2208 | F: 775.788.2283
wbeavers@fennemorelaw.com | [View Bio](#)

<[1.png](#)><[2.png](#)><[4.png](#)>
<[3.png](#)>

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From: Milan Chatterjee <milan@milanslegal.com>
Sent: Tuesday, January 2, 2024 11:34 AM
To: Joshua.Sliker@jacksonlewis.com; Beavers, Wade <WBeavers@fennemorelaw.com>; Pierce, Shannon <SPierce@fennemorelaw.com>
Cc: Kathleen Bliss <kb@kathleenblisslaw.com>
Subject: Dispositive Motions Deadline - Thompson v. Tesla, et al.
Importance: High

Dear Counsel,

As you know, the Court has ordered a settlement conference for 1/16. Our dispositive motions are due 1/12.

In light that we now need to prepare for the settlement conference, I wanted to see if you're willing to stipulate to extending the dispositive motions deadline to 1/23.

Please advise.

Best regards,
Milan Chatterjee, Esq.
Founder & Managing Member

[<image001.png>](#)

Phone Number: 1 (702) 381-2875
Licensed in California, Nevada, and New York
Texas Bar Admission Pending
Website: MilansLegal.com

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