

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

24 HOUR FITNESS, INC.	)	
	)	
Petitioner,	)	
	)	
vs.	)	<b>Case No. 11-CV-418</b>
	)	
RAMSAY GEHA,	)	
	)	
Respondent.	)	
	)	

**STIPULATION AND ORDER**

The Parties in the above matter have reached an agreement in principle to resolve all claims, motions and issues outstanding between them, including the above captioned action pending before this Court, and are in the process of memorializing the agreement. Accordingly, the parties, through their undersigned counsel, stipulate to a one-week extension of time for the filing of opposition and reply briefs to Respondents’ Omnibus Motion for Order Entitling Respondents to an Award of Reasonable Attorneys’ Fees and Costs as Sanctions Against Petitioner and its Counsel of Record under 28 U.S.C. 1927 and the Bad Faith Exception to the American Rule, and all related documents, including declarations, exhibits and Notices of Joinder in said motions. Therefore, in an effort to preserve judicial resources pending the execution of a Settlement Agreement, the Parties believe that a one-week extension is appropriate. The Parties will continue to keep the Court apprised of the status of the settlement.

IT IS SO STIPULATED.

Dated: February 4, 2013

/s/ Justin P. Karczag  
Justin P. Karczag  
California Bar Number: 223764  
Nevada Bar Number: 12414  
Hawaii Bar Number: 9709  
Federal I.D. 1357865

FOLEY BEZEK BEHLE & CURTIES, LLP  
575 Anton Blvd., Suite 710  
Costa Mesa, California 92626  
Phone: 714.556.1700  
Fax: 714.546.5005  
E-Mail: [jkarczag@foleybezek.com](mailto:jkarczag@foleybezek.com)

Attorneys for Respondent


Dated: February 4, 2013

/s/ Jeannie M. DeVeney  
Jeannie M. DeVeney #24356  
LITTLER MENDELSON, P.C.  
1201 Walnut Street, Suite 1450  
Kansas City, MO 64106  
Telephone: 816.627.4405  
Fax: 816.627.1453  
[jdeveney@littler.com](mailto:jdeveney@littler.com)

Attorneys for Petitioner

**IT IS SO ORDERED**

Dated: 2/4/2013



---

JUDGE JOSEPH BATAILLON  
United States District Court Judge for the  
District of Nebraska