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 20 THEODORE TRAPP and the putative class

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*Attorneys for Defendants*  
 DÉJÀ VU SHOWGIRLS OF LAS VEGAS, LLC LITTLE  
 DARLINGS OF LAS VEGAS, LLC LAS VEGAS ENTERTAINMENT, LLC

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

THEODORE TRAPP, on his own behalf and  
 on behalf of all others similarly situated,

Plaintiff,

v.

BIG POPPA'S, LLC, a Nevada limited  
 liability company d/b/a BADDA BING  
 MEN'S CLUB; SKY TOP VENDING, INC.,  
 a Nevada Corporation d/b/a CAN CAN  
 ROOM; LA FUENTE, INC., a Nevada  
 corporation d/b/a CHEETAH'S; C.P. FOOD  
 AND BEVERAGE, INC., a Nevada  
 corporation d/b/a CLUB PARADISE; DÉJÀ

Case No. 2:09-cv-00995

**STIPULATION TO ENLARGE TIME  
 FOR PLAINTIFF TO RESPOND TO  
 MOTION TO DISMISS**

**Honorable Lloyd D. George**

**Magistrate Judge Peggy A. Leen**

1 VU SHOWGIRLS OF LAS VEGAS, LLC, a  
Nevada limited liability company d/b/a DEJA  
2 VU SHOWGIRLS; PALOMINO CLUB,  
INC., a Nevada corporation d/b/a  
3 PALOMINO CLUB; SHAC, LLC, a Nevada  
limited liability company d/b/a SAPPHIRE;  
K-KEL, INC., a Nevada corporation d/b/a  
4 SPEARMINT RHINO; D.2801  
WESTWOOD, INC., a Nevada corporation  
d/b/a TREASURES; LITTLE DARLINGS OF  
5 LAS VEGAS, LLC, a Nevada limited liability  
company d/b/a LITTLE DARLINGS; O.G.  
6 ELIADES, A.D., LLC, a Nevada limited  
liability company d/b/a OLYMPIC  
7 GARDENS; LAS VEGAS  
ENTERTAINMENT, LLC, a Nevada limited  
liability company d/b/a LARRY FLYNT'S  
8 HUSTLER CLUB; MICHAEL A. SALTMAN  
d/b/a MINXX; RICK'S LAS VEGAS;  
9 FRIAS MANAGEMENT, LLC, a Nevada  
limited liability company d/b/a ACE CAB  
COMPANY and A-NORTH LAS VEGAS  
10 CAB; WESTERN CAB COMPANY, a  
Nevada corporation d/b/a WESTERN CAB  
11 COMPANY and WESTERN LIMOUSINE;  
NEVADA CHECKER CAB  
CORPORATION, a Nevada corporation d/b/a  
12 CHECKER CAB COMPANY; NEVADA  
STAR CAB CORPORATION, a Nevada  
13 corporation d/b/a STAR CAB COMPANY;  
NEVADA YELLOW CAB CORPORATION,  
14 a Nevada corporation d/b/a YELLOW CAB  
COMPANY; LUCKY CAB COMPANY OF  
NEVADA, a Nevada corporation d/b/a  
15 LUCKY TRANS; SUN CAB, INC., a Nevada  
corporation d/b/a NELLIS CAB COMPANY;  
16 CLS NEVADA, LLC, a Nevada limited  
liability company d/b/a CLS  
TRANSPORTATION LAS VEGAS;  
17 ON DEMAND SEDAN SERVICES, LLC, a  
Nevada limited liability company d/b/a ODS  
18 LIMOUSINE and ODS CHAUFFEURED  
TRANSPORTATION; BLS LIMOUSINE  
SERVICE OF LAS VEGAS, INC., a Nevada  
19 corporation d/b/a BLS LIMOUSINE  
SERVICE OF LAS VEGAS; DESERT CAB,  
20 INC., a Nevada corporation d/b/a DESERT  
CAB COMPANY and ODYSSEY  
21 LIMOUSINE; BELL TRANS A NEVADA  
CORPORATION, a Nevada corporation d/b/a  
22 BELL TRANS; TONY CHONG, an  
individual; and DOE EMPLOYEES 1-1000;

23 Defendants.

24 Plaintiff Theodore Trapp ("Plaintiff" or "Trapp") and Defendants Déjà Vu Showgirls of

Las Vegas, LLC, Little Darlings of Las Vegas, LLC, and Las Vegas Entertainment, LLC

1 (collectively “Defendants”) propose the following Stipulation and Proposed Order enlarging the  
2 time for Plaintiff to respond to Defendants’ Motion to Dismiss. In support, the Parties state as  
3 follows:

4 **WHEREAS**, on June 2, 2009, Plaintiff filed a four-count putative class action complaint  
5 (“the Complaint”) against the Defendants alleging violations of Nevada’s Racketeering Statute;

6 **WHEREAS**, on June 25, 2009, Plaintiff and Defendants stipulated to enlarge the time for  
7 Defendants to answer or otherwise plead to the Complaint until June 29, 2009;

8 **WHEREAS**, on June 29, 2009, Defendants filed a Motion to Dismiss the Complaint  
9 pursuant to Rules 12(b)(6) and 23(a) of the Federal Rules of Civil Procedure;

10 **WHEREAS**, pursuant to Local Rule 7-2, Plaintiff’s response brief is due to be filed with  
11 the Court on or before July 15, 2009;

12 **WHEREAS**, Plaintiff seeks an additional two-week enlargement of time to respond to  
13 Defendants’ Motion to Dismiss up to and including July 29, 2009;

14 **WHEREAS**, Plaintiff’s counsel has conferred with counsel for Defendants and is  
15 authorized to state that Defendants have no objection to the enlargement of time requested  
16 herein.

17 **NOW THEREFORE**, the Parties hereby **STIPULATE** and **AGREE** as follows:

18 1. Plaintiff’s last day to file and serve his opposition to the Motion to Dismiss of  
19 Defendants Déjà Vu Showgirls of Las Vegas, LLC, Little Darlings of Las Vegas, LLC and Las  
20 Vegas Entertainment, LLC shall be July 29, 2009;

21 2. Defendants Déjà Vu Showgirls of Las Vegas, LLC, Little Darlings of Las Vegas,  
22 LLC and Las Vegas Entertainment, LLC, last day to file and serve their reply briefs in support of  
23 the motion to dismiss shall be shall be August 12, 2009.

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**IT IS SO STIPULATED.**

THEODORE TRAPP, individually and  
on behalf of all others similarly situated

DÉJÀ VU SHOWGIRLS OF LAS VEGAS, LLC  
LITTLE DARLINGS OF LAS VEGAS, LLC  
LAS VEGAS ENTERTAINMENT, LLC

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*Attorneys for Defendants*

**IT IS SO ORDERED.**

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 2009

\_\_\_\_\_  
LLOYD D. GEORGE  
UNITED STATES DISTRICT JUDGE