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9 *Attorneys for Plaintiff*
10 THEODORE TRAPP and the putative class

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

17 **UNITED STATES DISTRICT COURT**

18 **DISTRICT OF NEVADA**

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

20 Plaintiff,

21 v.

22 BIG POPPA'S, LLC, a Nevada limited
liability company d/b/a BADDA BING
MEN'S CLUB; SKY TOP VENDING, INC.,
23 a Nevada Corporation d/b/a CAN CAN
ROOM; LA FUENTE, INC., a Nevada
24 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

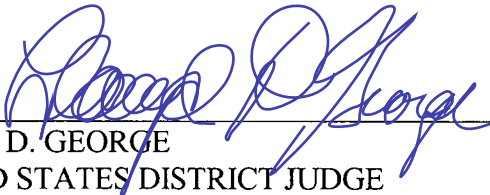
DÉJÀ VU SHOWGIRLS OF LAS VEGAS, LLC
LITTLE DARLINGS OF LAS VEGAS, LLC
LAS VEGAS ENTERTAINMENT, LLC

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Attorneys for Defendants

IT IS SO ORDERED.

Dated this 17 day of July, 2009



LLOYD D. GEORGE
UNITED STATES DISTRICT JUDGE