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20 *Attorneys for Plaintiff*
 21 THEODORE TRAPP and the putative class

22 **UNITED STATES DISTRICT COURT**
 23 **DISTRICT OF NEVADA**

24 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 BADDABING
 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
 VU SHOWGIRLS OF LAS VEGAS, LLC, a
 Nevada limited liability company d/b/a DÉJÀ
 VU SHOWGIRLS; PALOMINO CLUB,
 INC., a Nevada corporation d/b/a
 PALOMINO CLUB; SHAC, LLC, a Nevada
 limited liability company d/b/a SAPPHIRE;
 K-KEL, INC., a Nevada corporation d/b/a
 SPEARMINT RHINO; D.2801
 WESTWOOD, INC., a Nevada corporation
 d/b/a TREASURES; LITTLE DARLINGS OF
 LAS VEGAS, LLC, a Nevada limited liability
 company d/b/a LITTLE DARLINGS; O.G.

Case No. 2:09-cv-00995

**STIPULATION TO ENLARGE TIME
 FOR DEFENDANT K-KEL, INC TO
 ANSWER OR OTHERWISE PLEAD TO
 PLAINTIFF'S COMPLAINT**

Honorable Lloyd D. George

Magistrate Judge Peggy A. Leen

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

18 Defendants.

19 Plaintiff Theodore Trapp ("Plaintiff" or "Trapp") and Defendant K-Kel, Inc.
20 ("Defendant" or "K-Kel") propose the following Stipulation and Proposed Order enlarging the
21 time for Defendant to answer or otherwise respond to Plaintiff's Complaint. In support, the
22 Parties state as follows:

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24 //././

1 **WHEREAS**, on June 2, 2009, Plaintiff filed a four-count putative class action complaint
2 (“the Complaint”) against the Defendant alleging violations of Nevada’s Racketeering Statute
3 and Consumer Fraud Statute;

4 **WHEREAS**, by stipulation dated June 30, 2009, Plaintiff and K-Kel stipulated to enlarge
5 the time for K-Kel to answer or otherwise plead to the Complaint until August 3, 2009;

6 **WHEREAS**, Defendant has now concluded that there are legal issues it believes would
7 be best addressed by a motion under Rule 12(b)(6) and it requires additional time in order to
8 prepare such motion, such that Defendant seeks an additional three-week enlargement of time to
9 respond to Plaintiff’s Complaint up to and including August 24, 2009;

10 **WHEREAS**, Defense counsel has conferred with Plaintiff’s counsel and is authorized to
11 state that Plaintiff has no objection to the enlargement of time requested herein.

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

13 1. Defendant’s last day to answer or otherwise plead to Plaintiff’s Complaint shall
14 be August 24, 2009.

15 **IT IS SO STIPULATED.**

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

K-KEL, INC. d/b/a SPEARMINT RHINO, a
Nevada corporation

18 By: /s/ James E. Smyth II
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IT IS SO ORDERED.

Dated this _____ day of _____, 2009

HONORABLE LLOYD D. GEORGE
UNITED STATES DISTRICT JUDGE