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 20 THEODORE TRAPP and the putative class

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Attorneys for Defendants
 BIG POPPAS, LLC AND O.G. ELIADES, A.D., 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 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;

Case No. 2:09-cv-00995

**STIPULATED REQUEST TO STAY
 PROCEEDINGS PENDING OUTCOME
 OF SETTLEMENT DISCUSSIONS**

Honorable Lloyd D. George

Magistrate Judge Peggy A. Leen

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

23 Defendants.

1 Plaintiff THEODORE TRAPP (“Plaintiff” or “Trapp”) and Defendants BIG POPPAS,
2 LLC d/b/a BADDA BING MEN’S CLUB and O.G. ELIADES, A.D., LLC d/b/a OLYMPIC
3 GARDENS, propose the following Stipulation and Proposed Order staying these proceedings for
4 90 days as to those Defendants. In support, the Parties state as follows:

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

7 **WHEREAS**, Plaintiff caused Defendant Big Poppas, LLC to be served with a copy of
8 the summons and complaint in this matter on or about June 8, 2009;

9 **WHEREAS**, Plaintiff caused Defendant O.G. Eliades, A.D., LLC to be served with a
10 copy of the summons and complaint in this matter on or about June 9, 2009.

11 **WHEREAS**, by Stipulation filed July 9, 2009, the Parties agreed, subject to the approval
12 of this Court, to enlarge the time for Defendants Big Poppas, LLC and O.G. Eliades, A.D., LLC
13 to answer or otherwise plead to the Complaint until August 3, 2009.

14 **WHEREAS**, Plaintiff and Defendants Big Poppas, LLC and O.G. Eliades, A.D., LLC,
15 seek entry of an Order staying these proceedings as to those Defendants to enable the Parties to
16 focus their efforts on settlement discussions in the hopes of bringing an early resolution to this
17 matter;

18 **WHEREAS**, Defendants Big Poppas, LLC and O.G. Eliades, A.D., LLC deny the
19 material allegations of the Complaint, deny they committed any wrongdoing, and deny any
20 liability to Plaintiff or the putative class of individuals that he purports to represent;

21 **WHEREAS**, taking into account the burdens and expense of protracted litigation,
22 including the risks and uncertainties associated with class certification, protracted trials, and
23 appeals, the Parties have decided to engage in settlement discussions to determine whether a
24 speedy and efficient resolution to this case may be achieved;

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

1. These proceedings are hereby stayed for ninety (90) days through and including
October 30, 2009, as to Defendants Big Poppas, LLC and O.G. Eliades, A.D., LLC.

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IT IS SO STIPULATED.

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

BIG POPPAS, LLC d/b/a BADDA BING MEN'S CLUB, and O.G. ELIADES, A.D., LLC d/b/a OLYMPIC GARDENS

By: /s/ Jay Edelson
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Attorneys for Plaintiff THEODORE TRAPP and the putative class

Attorneys for Defendants BIG POPPAS, LLC and O.G. ELIADES, A.D., LLC

IT IS SO ORDERED.

Dated this _____ day of _____, 2009

HONORABLE LLOYD D. GEORGE
UNITED STATES DISTRICT JUDGE