

1 Mark E. Trafton, Esq.  
 Nevada State Bar No. 6525  
 2 1900 Industrial Road  
 Las Vegas, Nevada 89102  
 3 Telephone: (702) 385-1813  
 Facsimile: (702) 382-9633  
 4

5 Attorney for Defendant,  
 BELL TRANS  
 6

7 U.S. DISTRICT COURT  
 8 DISTRICT OF NEVADA

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

CASE NO. 2:09-CV-00995-KJD-GWF

11 Plaintiff,

12 vs.

STIPULATION AND ORDER  
 TO EXTEND DATE FOR  
 DEFENDANT BELL TRANS  
 TO RESPOND TO PLAINTIFF'S  
 CLASS ACTION COMPLAINT

13 BIG POPPA'S, LLC, a Nevada limited liability  
 company d/b/a BADDA BING MEN'S CLUB;  
 14 SKY TOP VENDING, INC., a Nevada corporation  
 d/b/a CAN CAN ROOM; LA FUENTE, INC., a  
 15 Nevada corporation d/b/a CHEETAH'S; C.P.  
 FOOD AND BEVERAGE, INC., a Nevada  
 16 corporation d/b/a CLUB PARADISE; DÉJÀ VU  
 SHOWGIRLS; PALOMINO CLUB, INC., a  
 17 Nevada corporation d/b/a PALOMINO CLUB;  
 SHAC, LLC, a Nevada corporation d/b/a  
 18 SAPPHIRE; K-KEL, INC., a Nevada corporation  
 d/b/a SPEARMINT RHINO; D.2801 WESTWOOD  
 19 INC., a Nevada corporation d/b/a TREASURES;  
 LITTLE DARLINGS OF LAS VEGAS, LLC, a  
 20 Nevada limited liability company d/b/a LITTLE  
 DARLINGS; O.G. ELIADES, A.D., LLC, a  
 21 Nevada limited liability company d/b/a OLYMPIC  
 GARDENS; LAS VEGAS ENTERTAINMENT,  
 22 LLC, a Nevada limited liability company d/b/a  
 LARRY FLYNT'S HUSTLER CLUB; MICHAEL  
 23 A. SALTMAN d/b/a MINXX; RICK'S LAS  
 VEGAS; FRIAS MANAGEMENT, LLC, a  
 24 Nevada limited liability company d/b/a ACE CAB  
 COMPANY and A-NORTH LAS VEGAS  
 25 CAB; WESTERN CAB COMPANY, a Nevada  
 corporation d/b/a WESTERN CAB COMPANY  
 26 and WESTERN LIMOUSINE; NEVADA  
 CHECKER CAB CORPORATION, a Nevada  
 27 corporation d/b/a NEVADA CHECKER CAB  
 COMPANY; NEVADA STAR CAB  
 28 CORPORATION, a Nevada corporation d/b/a  
 STAR CAB COMPANY; NEVADA YELLOW  
 CAB CORPORATION, a Nevada corporation

(SECOND REQUEST)

1 d/b/a YELLOW CAB COMPANY; LUCKY CAB )  
 2 COMPANY OF NEVADA, a Nevada corporation )  
 3 d/b/a LUCKY TRANS; SUN CAB, INC., a Nevada )  
 4 corporation d/b/a NELLIS CAB COMPANY; CLS )  
 5 NEVADA, LLC, a Nevada limited liability )  
 6 company d/b/a CLS TRANSPORTATION )  
 7 LAS VEGAS; ON DEMAND SEDAN )  
 8 SERVICES, LLC, a Nevada limited liability )  
 9 company d/b/a ODS LIMOUSINES and ODS )  
 10 CHAUFFEURS TRANSPORTATION; BLS )  
 11 LIMOUSINE SERVICE OF LAS VEGAS, INC.; )  
 12 DESERT CAB, INC., a Nevada corporation d/b/a )  
 13 DESERT CAB COMPANY and ODYSSEY )  
 14 LIMOUSINE; BELL TRANS A NEVADA )  
 15 CORPORATION, a Nevada corporation d/b/a )  
 16 BELL TRANS; TONY CHONG, an individual; )  
 17 and DOE EMPLOYEES 1-1000; )  
 18  
 19 Defendants. )

12 Plaintiff Theodore Trapp (“Plaintiff” or “Trapp”) and Defendant Bell Trans, a Nevada  
 13 Corporation propose the following Stipulation and Proposed Order enlarging the time for Defendant  
 14 to answer or otherwise respond to Plaintiff’s Complaint. In support, the Parties state as follows:

15 **WHEREAS**, on June 2, 2009, Plaintiff filed a four-count putative class action Complaint  
 16 (“Complaint”) against Bell Trans alleging violations of Nevada’s Racketeering Statute and  
 17 Consumer Fraud Statute;

18 **WHEREAS**, by Stipulation dated July 16, 2009, Plaintiff and Bell Trans stipulated to extend  
 19 the time for Bell Trans to respond to Plaintiff’s Complaint until August 3, 2009 (order signed on July  
 20 22, 2009);

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

25 **WHEREAS**, defense counsel has conferred with Plaintiff’s counsel and is authorized to state  
 26 that Plaintiff has no objection to the extension of time requested herein.

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

28

