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10 LITTLE DARLINGS OF LAS VEGAS, LLC  
11 LAS VEGAS ENTERTAINMENT, LLC

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF, NEVADA**

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

13 Plaintiff,

14 vs.

CASE NO. 2:09-cv-00995

15 BIG POPPA'S, LLC, a Nevada limited  
16 liability company d/b/a BADDA  
17 BINGMEN'S CLUB; SKY TOP VENDING,  
18 INC., a Nevada Corporation d/b/a CAN CAN  
19 ROOM; LA FUENTE, INC., a Nevada  
20 corporation d/b/a CHEETAH'S; C.P. FOOD  
21 AND BEVERAGE, INC., a Nevada  
22 corporation d/b/a CLUB PARADISE; DEJA  
23 VU SHOWGIRLS OF LAS VEGAS, LLC, a  
24 Nevada limited liability company d/b/a DEJA  
25 VU SHOWGIRLS; PALOMINO CLUB,  
26 INC., a Nevada corporation d/b/a  
27 PALOMINO CLUB; SHAC, LLC, a Nevada  
28 limited liability company d/b/a SAPPHIRE;  
d/b/a STAR CAB COMPANY; 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;

**DEFENDANTS DEJA VU SHOWGIRLS  
OF LAS VEGAS, LLC, LITTLE  
DARLINGS OF LAS VEGAS, LLC AND  
LAS VEGAS ENTERTAINMENT, LLC'S  
OPPOSITION TO PLAINTIFF'S  
MOTION FOR AN ENLARGEMENT OF  
TIME TO RESPOND TO THE MOTION  
OF DEFENDANTS DEJA VU  
SHOWGIRLS OF LAS VEGAS, LLC,  
LITTLE DARLINGS OF LAS VEGAS,  
LLC, AND LAS VEGAS  
ENTERTAINMENT, LLC FOR  
DISMISSAL OF THE COMPLAINT AND  
FOR LEAVE TO FILE A  
CONSOLIDATED RESPONSE IN  
OPPOSITION TO ANY CURRENT AND  
FUTURE MOTIONS TO DISMISS THE  
COMPLAINT**

1 O.G. ELIADES, A.D., LLC, a Nevada  
2 limited liability company d/b/a OLYMPIC  
3 GARDENS; LAS VEGAS  
4 ENTERTAINMENT, LLC, a Nevada limited  
5 liability company d/b/a LARRY FLYNT'S  
6 HUSTLER CLUB; MICHAEL A.  
7 SALTMAN d/b/a MINXX; RICK'S LAS  
8 VEGAS; FRIAS MANAGEMENT, LLC, a  
9 Nevada limited liability company d/b/a ACE  
10 CAB COMPANY and A-NORTH LAS  
11 VEGAS CAB; WESTERN CAB  
12 COMPANY, a Nevada corporation d/b/a  
13 WESTERN CAB COMPANY and  
14 WESTERN LIMOUSINE; NEVADA  
15 CHECKER CAB CORPORATION, a  
16 Nevada corporation d/b/a CHECKER CAB  
17 COMPANY; NEVADA STAR CAB  
18 CORPORATION, a Nevada corporation  
19 d/b/a STAR CAB COMPANY; NEVADA  
20 YELLOW CAB CORPORATION, a Nevada  
21 corporation d/b/a YELLOW CAB  
22 COMPANY; LUCKY CAB COMPANY OF  
23 NEVADA, a Nevada corporation d/b/a  
24 LUCKY TRANS; SUN CAB, INC., a  
25 Nevada corporation d/b/a NELLIS CAB  
26 COMPANY; CLS NEVADA, LLC, a  
27 Nevada limited liability company d/b/a CLS  
28 TRANSPORTATION LAS VEGAS; ON  
DEMAND SEDAN SERVICES, LLC, a  
Nevada limited liability company d/b/a ODS  
LIMOUSINE and ODS CHAUFFEURED  
TRANSPORTATION; BLS LIMOUSINE  
SERVICE OF LAS VEGAS, INC., a Nevada  
corporation d/b/a BLS LIMOUSINE  
SERVICE OF LAS VEGAS; DESERT CAB,  
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;

Defendants.

1 COMES NOW Defendants DEJA VU SHOWGIRLS OF LAS VEGAS, LLC, LITTLE  
2 DARLINGS OF LAS VEGAS, LLC, and LAS VEGAS ENTERTAINMENT, LLC, (hereafter  
3 "Defendants") by and through their attorney, Neil J. Beller, Esq. and submits the following as  
4 their Opposition to Plaintiff's Motion for an Enlargement of Time to Respond to the Motion of  
5 Defendants Deja Vu Showgirls of Las Vegas, LLC, Little Darlings of Las Vegas, LLC, and Las  
6 Vegas Entertainment, LLC for Dismissal of the Complaint and for Leave to File a Consolidated  
7 Response in Opposition to Any Current and Future Motions to Dismiss the Complaint.

### 8 PERTINENT FACTUAL BACKGROUND

9 Plaintiff filed his Complaint on June 2, 2009. Defendants filed their Motion to Dismiss on  
10 June 29, 2009. On July 15, 2009, a Stipulation was filed in this Court whereby Defendants and  
11 Plaintiff stipulated that Plaintiff had until July 29, 2009 to file a response to Defendants motion to  
12 dismiss.

13 Then, on July 29, 2009, Plaintiff not only filed his motion to request a second extension of  
14 time to respond to Defendants motion to dismiss, but also requested that he be permitted to wait  
15 until thirty (30) days after all defendants have responded to file a consolidated response to all  
16 current and future motions to dismiss.

### 17 ARGUMENT

18 Considering that Defendants were the first defendants to respond to the Complaint,  
19 Defendants certainly object to having to wait for exactly who knows when for Plaintiff's  
20 response to their motion to dismiss.

21 Plaintiff now seeks to avoid duplication, promote judicial economy and preserve the  
22 resources of the litigants. See, paragraph 7 of motion. When 27 persons/entities are named as  
23 defendants in a class action complaint, it hardly seems likely that judicial economy can be helped;  
24 that duplication can be avoided; and that resources can be preserved. As of August 10, 2009, 175  
25 documents have already been filed in this Court, and not all defendants have as yet responded.

26 Plaintiff wants a delay so that he will have to file only one documents in response to the  
27 motions to dismiss that have been filed and that are anticipated to be filed. A delay might be  
28 advantageous to Plaintiff, but unjust and prejudicial to all defendants. Deadlines in the law

1 business, serve a useful purpose and reasonable adherence to them is to be encouraged. Spears v.  
2 City of Indianapolis, 74 F.3d 153, 157-158 (7<sup>th</sup> Cir. 1996) The Fifth Circuit has noted that

3 [D]elays are a particularly abhorrent feature of today's trial practice.  
4 They increase the cost of litigation, to the detriment of the parties  
5 enmeshed in it; they are one factor causing disrespect for lawyers  
6 and the judicial process; and they fuel the increasing resort to means  
7 of non-judicial dispute resolution. Adherence to reasonable  
8 deadlines is critical to restoring integrity in court proceedings.

9 Geiserman v. MacDonald, 893 F.2d 787, 791 (5<sup>th</sup> Cir. 1990).

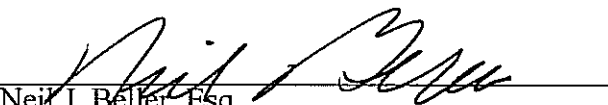
10 Defendants certainly do not object to reasonable extensions of time, but Defendants have  
11 already stipulated with Plaintiff that the deadline was July 29, 2009 for Plaintiff to respond to  
12 Defendants motion to dismiss. Plaintiff did not request a second extension of time from  
13 Defendants to respond to their motion based on a legitimate reason. Rather, Plaintiff now wants  
14 to filed only one document in response to all defendants motions to dismiss.

15 Plaintiff cannot establish good cause as required by F.Rule.Civ.P. 6 (b) (1). "Good cause"  
16 is defined as "substantial reason, one that offers a legal excuse." Black's Law Dictionary, 5<sup>th</sup> Ed.  
17 Plaintiffs has failed to establish good cause because he has failed to state any legitimate factual  
18 reason why he needs an extension of time to respond.

### 19 CONCLUSION

20 Based on the foregoing, Defendants, DEJA VU SHOWGIRLS OF LAS VEGAS, LLC,  
21 LITTLE DARLINGS OF LAS VEGAS, LLC, and LAS VEGAS ENTERTAINMENT, LLC  
22 respectfully request this Honorable Court to deny Plaintiff's Motion.

23 Dated this 12 day of August, 2009.

24   
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LITTLE DARLINGS OF LAS VEGAS, LLC  
LAS VEGAS ENTERTAINMENT, LLC

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of the law firm of NEIL J. BELLER, LTD. and on the 12 of August, 2009, service of the foregoing **DEFENDANTS DEJA VU SHOWGIRLS OF LAS VEGAS, LLC, LITTLE DARLINGS OF LAS VEGAS, LLC'S, AND LAS VEGAS ENTERTAINMENT, LLC'S** Opposition to Plaintiff's Motion for an Enlargement of Time to Respond to the Motion of Defendants Deja Vu Showgirls of Las Vegas, LLC, Little Darlings of Las Vegas, LLC, and Las Vegas Entertainment, LLC for Dismissal of the Complaint and for Leave to File a Consolidated Response in Opposition to Any Current and Future Motions to Dismiss the Complaint was made, by electronically transmitting to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing addressed to the following:

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