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19	THEODORE TRAPP and the putative class	
20		
21	UNITED STATES DISTRICT COURT	
22	DISTRICT OF NEVADA	
23	THEODORE TRAPP, on his own behalf and on behalf of all others similarly situated,	Case No. 2:09-cv-00995
24		
	Plaintiff,	STIPULATED REQUEST TO STAY
25	v.	PROCEEDINGS PENDING OUTCOME OF SETTLEMENT DISCUSSIONS
26		(Second Request)
27	BIG POPPA'S, LLC, a Nevada limited liability company d/b/a BADDA BING MEN'S CLUB; SKY TOP VENDING, INC., a Nevada	Honorable Lloyd D. George
28	Corporation d/b/a CAN CAN ROOM;	Magistrate Judge Peggy A. Leen

LA FUENTE, INC., a Nevada corporation d/b/a CHEETAH'S: 2 C.P. FOOD AND BEVERAGE, INC., a Nevada corporation d/b/a CLUB PARADISE; 3 DÉJÀ VU SHOWGIRLS OF LAS VEGAS, LLC, a Nevada limited liability company d/b/a 4 DĖJA VU SHOWGIRLS: PALOMINO CLUB, INC., a Nevada 5 corporation d/b/a PALOMINO CLUB; SHAC, LLC, a Nevada limited liability 6 company d/b/a SAPPHIRE; K-KEL, INC., a Nevada corporation d/b/a 7 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; 10 O.G. ELIADES, A.D., LLC, a Nevada limited liability company d/b/a OLYMPIC 11 GARDENS; LAS VEGAS ENTERTAINMENT, LLC, a 12 Nevada limited liability company d/b/a LARRY FLYNT'S HUSTLER CLUB; 13 MICHAEL A. SALTMAN d/b/a MINXX; RICK'S LAS VEGAS; FRIAS MANAGEMENT, LLC, a Nevada 14 limited liability company d/b/a ACE CAB 15 COMPANY and A-NORTH LAS VEGAS CAB: 16 WESTERN CAB COMPANY, a Nevada corporation d/b/a WESTERN CAB 17 COMPANY and WESTERN LIMOUSINE; NEVADA CHECKER CAB CORPORATION, 18 a Nevada corporation d/b/a CHECKER CAB COMPANY: 19 NEVADA STAR CAB CORPORATION, a Nevada corporation d/b/a STAR CAB 20 COMPANY; NEVADA YELLOW CAB CORPORATION. 21 a Nevada corporation d/b/a YELLOW CAB COMPANY: 22 LUCKY CAB COMPANY OF NEVADA, a Nevada corporation d/b/a LUCKY TRANS; 23 SUN CAB, INC., a Nevada corporation d/b/a **NELLIS CAB COMPANY**; 24 CLS NEVADA, LLC, a Nevada limited liability company d/b/a CLS 25 TRANSPORTATION LAS VEGAS; ON DEMAND SEDAN SERVICES, LLC, a 26 Nevada limited liability company d/b/a ODS LIMOUSINE and ODS CHAUFFEURED 27 TRANSPORTATION: BLS LIMOUSINE SERVICE OF LAS 28 | VEGAS, INC., a Nevada corporation d/b/a

BLS LIMOUSINE SERVICE OF LAS

1 2	VEGAS; DESERT CAB, INC., a Nevada corporation d/b/a DESERT CAB COMPANY and		
3	ODYSSEY LIMOUSINE; BELL TRANS A NEVADA CORPORATION,		
4	a Nevada corporation d/b/a BELL TRANS; TONY CHONG, an individual; and		
5	DOE EMPLOYEES 1-1000;		
6	Defendants.		
7	Plaintiff THEODORE TRAPP ("Plaintiff" or "Trapp") and Defendants BIG POPPAS, LLC		
8	d/b/a BADDA BING MEN'S CLUB and O.G. ELIADES, A.D., LLC d/b/a OLYMPIC GARDENS,		
9	propose the following Stipulation and Proposed Order staying these proceedings for 60 days as to		
10	those Defendants. In support, the Parties state as follows:		
11	WHEREAS, on June 2, 2009, Plaintiff filed a four-count putative class action complaint ("the		
12	Complaint") against the Defendants alleging violations of Nevada's Racketeering Statute;		
13	WHEREAS, Plaintiff caused Defendant Big Poppas, LLC to be served with a copy of the		
	summons and complaint in this matter on or about June 8, 2009;		
14	WHEREAS, Plaintiff caused Defendant O.G. Eliades, A.D., LLC to be served with a copy of		
15	the summons and complaint in this matter on or about June 9, 2009.		
16	WHEREAS, by Stipulation filed July 9, 2009, the Parties agreed, subject to the approval of		
17 18	this Court, to enlarge the time for Defendants Big Poppas, LLC and O.G. Eliades, A.D., LLC to		
	answer or otherwise plead to the Complaint until August 3, 2009.		
19	WHEREAS, by Stipulation filed July 30, 2009, the Parties agreed, subject to the approval of		
20	this Court, to stay the proceedings pending an outcome of Settlement Discussions for Defendants Big		
21	Poppas, LLC and O.G. Eliades, A.D., LLC until October 30, 2009.		
22	WHEREAS, Plaintiff and Defendants Big Poppas, LLC and O.G. Eliades, A.D., LLC, seek		
23	entry of an Order staying these proceedings for an additional sixty days as to those Defendants to		
24	enable the Parties to continue to focus their efforts on settlement discussions in the hopes of bringing		
25	an early resolution to this matter;		
26	WHEREAS, Defendants Big Poppas, LLC and O.G. Eliades, A.D., LLC deny the material		
27	allegations of the Complaint, deny they committed any wrongdoing, and deny any liability to Plaintiff		
28	or the putative class of individuals that he purports to represent;		

1	WHEREAS, taking into account the burdens and expense of protracted litigation, including	
2	the risks and uncertainties associated with class certification, protracted trials, and appeals, the Parties	
3	have decided to engage in settlement discussions to determine whether a speedy and efficient	
4	resolution to this case may be achieved;	
5	NOW THEREFORE, the Parties hereby STIPULATE and AGREE as follows:	
6	1. These proceedings are hereby stayed for sixty (60) days through and including	
7 8	December 29, 2009, as to Defendants Big Poppas, LLC and O.G. Eliades, A.D., LLC. IT IS SO STIPULATED.	
9	Dated this 30 <sup>th</sup> day of October, 2009	
10	THEODORE TRAPP, individually and on behalf of all others similarly situated	BIG POPPAS, LLC d/b/a BADDA BING MEN'S CLUB, a Nevada limited liability company, and
11		O.G. ELIADES, A.D., LLC d/b/a OLYMPIC GARDENS
12	Dev /s/Defee Deleberies	By: /s/ David Brown
13	By: <u>/s/ Rafey Balabanian</u> Rafey Balabanian (ARDC No. 6285687) KAMBEREDELSON LLC	Mr. David T. Brown (Nevada Bar No. 006914) BROWN, BROWN & PREMSRIRUT
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17	Attorneys for Plaintiff	Attorneys for Defendants
18	THEODORE TRAPP and the putative class	BIG POPPAS, LLC & O.G. ELIADES, A.D., LLC
19	G	
20 21	Dated this day of, 2009	Range Hisorge
22		OYD D. GEORGE ITED STATES DISTRICT JUDGE
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