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9 Attorneys for Defendant  
10 PLATINUM HOTEL & SPA AND WILLIAM SIMPSON

11 UNITED STATES DISTRICT COURT  
12 DISTRICT OF NEVADA

13 THEODORE HOOKS,

14 Plaintiff,

15 vs.

16 PLATINUM HOTEL & SPA, WILLIAM  
17 SIMPSON, and ROY FOSTER, a guest of  
18 the hotel,

19 Defendant.

Case No. 2:10-CV-01151-KJD-RJJ

WILLIAM SIMPSON'S MOTION TO  
EXTEND TIME TO FILE RESPONSE TO  
COMPLAINT

(First Request)

20 COMES NOW Defendant William Simpson by and through counsel, and hereby respectfully  
21 requests an extension of time to file his responsive pleading in the above-entitled action, up to and  
22 including February 23, 2011.<sup>1</sup>

23 This is the first extension of time requested by Simpson in connection with this matter. Mr.  
24 Simpson requests this brief extension, not for purposes of delay. Rather, for the same reasons set  
25 forth further in the Declaration of Peter D. Navarro, attached as Exhibit A to Platinum Hotel & Spa's  
26 Motion to Extend Time to File Response to Complaint [Dkt. No. 13]. Mr. Simpson only recently  
27 retained counsel who need additional time to investigate Plaintiff's allegations and prepare a full and

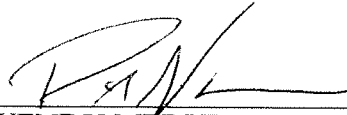
28 <sup>1</sup> Mr. Simpson requests the same extension to respond as was granted Defendant, Platinum Hotel & Spa through this Court's Order dated February 8, 2011 [Dkt. No. 14]. It was counsel's original intent to request an extension for both Mr. Simpson and the Platinum Hotel, however, Mr. Simpson's name was inadvertently omitted from the prior motion [Dkt. No. 13].

1 complete response to Plaintiff's Complaint. In addition, Mr. Simpson counsel has been unable to  
2 contact Plaintiff in order to obtain Plaintiff's position on the filing of this motion as the telephone  
3 number provided with Plaintiff's Complaint appears to be out of service and unable to receive voice  
4 mail.

5 Mr. Simpson further submits that the extension sought will not interfere with this Court's  
6 schedule as specific dates for this case have not yet been set by the Court.

7  
8 Dated: February 9, 2011

9 Respectfully submitted,

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11 \_\_\_\_\_  
12 WENDY MEDURA KRINCEK, ESQ.  
13 PETER D. NAVARRO, ESQ.  
14 LITTLER MENDELSON

15 Attorneys for Defendant  
16 PLATINUM HOTEL & SPA AND WILLIAM  
17 SIMPSON

18  
19 IT IS SO ORDERED.

20 

21 \_\_\_\_\_  
22 UNITED STATES MAGISTRATE JUDGE  
23 DATE: MARCH 14, 2011