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Attorney for Plaintiffs

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

BARBARA RIVARD-CROOK; BILL CROOK;  
RAMON CORONA; MONIQUE DECHaine;  
CHARLES DRAKE, JR.; LENORA HAYES;  
RISA HERRERA; NATÉ IMAHARA; ERIKA  
KNAPP; SANDRA LAUE; JOHN  
LAWRENCE; ARCELIA MALDONADO;  
KELLY STEVENS; RICK WRIGHT,

Plaintiffs,

v.

ACCELERATED PAYMENT  
TECHNOLOGIES, INC., a Delaware  
Corporation; and DOES 1 through 100, inclusive,

Defendants.

Case No. 2:10-cv-02215-MMD-GWF

**STIPULATION TO EXTEND THE  
PARTIES' DEADLINE FOR  
SUBMISSION OF THEIR JOINT  
PROPOSED PRETRIAL  
MEMORANDUM BY FORTY-FIVE  
(45) DAYS**

(First Request)

**AND CONSOLIDATED ACTIONS**

The parties, by and through their respective counsel of record, hereby Stipulate to Extend the parties' deadline for submission of their Joint Proposed Pretrial Memorandum by forty-five (45) days (i.e., from February 18, 2016 until April 4, 2016). In this regard, given the voluminous record at issue (i.e., hundreds of thousands of pages of exhibits and over 45 deposition transcripts) and the extensive legal issues that must be summarized for the Court, additional time is needed to complete the joint submission. Notably, however, the requested extension will:

1 (1) enable the parties to meaningfully condense the voluminous record for trial, eliminating  
2 duplicative exhibits where appropriate; (2) streamline the legal issues that will be presented to  
3 the jury, including, without limitation, submission of stipulated findings of fact which, in turn,  
4 should reduce the number of trial days required; and (3) afford the parties several meet and  
5 confer opportunities whereby they can revisit the appropriateness of participating in another  
6 settlement conference and/or proceeding with trial.

7  
8 RESPECTFULLY SUBMITTED this 26<sup>th</sup> day of January, 2016.

9  
10 Marquiz Law Office  
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Weil & Drage, APC

11 By: /s/ Craig A. Marquiz, Esq.  
12 Craig A. Marquiz, Esq.  
13 3088 Via Flaminia Court  
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Attorney for the Rivard-Crook Plaintiffs

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17 By: /s/ Arthur Silbergeld, Esq.  
18 Arthur Silbergeld, Esq.  
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By: /s/ Karl O. Riley, Esq.  
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Suite 1100  
Las Vegas, NV 890169  
Attorney for Defendants

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24 **ORDER**

25 IT IS SO ORDERED.

26 DATE: January 27, 2016

  
United States District Court Judge