

1 Scott E. Gizer, Esq., Nevada Bar No. 12216  
 2 *sgizer@earlysullivan.com*  
 3 EARLY SULLIVAN WRIGHT  
 4 GIZER & McRAE LLP  
 5 601 South Seventh Street, 2<sup>nd</sup> Floor  
 6 Las Vegas, Nevada 89101  
 7 Telephone: (702) 331-7593  
 8 Facsimile: (702) 331-1652

9 Devin A. McRae, *Pro Hac Vice*  
 10 *dmcrae@earlysullivan.com*  
 11 EARLY SULLIVAN WRIGHT  
 12 GIZER & McRAE LLP  
 13 6420 Wilshire Boulevard, 17th Floor  
 14 Los Angeles, California 90048  
 15 Telephone: (323) 301-4660  
 16 Facsimile: (323) 301-4676

17 Erik C. Alberts, *Pro Hac Vice*  
 18 *erik.alberts@ealawfirm.net*  
 19 LAW OFFICES OF ERIK C. ALBERTS  
 20 5900 Wilshire Boulevard, 26th Floor  
 21 Los Angeles, California 90036  
 22 Telephone: (323) 330-0583  
 23 Facsimile: (323) 330-0584

24 Attorneys for Plaintiff  
 25 KARL E. RISINGER, and those similarly situated

26 **UNITED STATES DISTRICT COURT**  
 27 **DISTRICT OF NEVADA**

28 KARL E. RISINGER, an individual, on  
 29 behalf of himself and all others similarly  
 30 situated,

31 Plaintiff,

32 vs.

33 SOC LLC, a Delaware limited liability  
 34 company registered and doing business in  
 35 Nevada as SOC NEVADA LLC; SOC-SMG,  
 36 INC., a Nevada corporation; DAY &  
 37 ZIMMERMAN, INC., a Maryland  
 38 corporation; and DOES 1-20, inclusive,

39 Defendants.

Case No.: 2:12-cv-00063-MMD-PAL

**STIPULATION AND [PROPOSED]  
 ORDER EXTENDING CASE  
 DEADLINES  
 (First Request)**



1 WHEREAS, on December 11, 2018, the Court ordered Plaintiff Karl E. Risinger  
2 (“Plaintiff”) and Defendants SOC LLC, SOC-SMG, Inc., and Day & Zimmermann, Inc. (together,  
3 “Defendants”, and jointly with Plaintiff, the “Parties”) to file a Joint Pretrial Order on April 2,  
4 2019;

5 WHEREAS, key members of Plaintiff’s trial counsel team are in trial in another matter  
6 from March 11, 2019, through March 29, 2019, and thus Plaintiff requests additional time to  
7 prepare the Pretrial Order, which is due on April 2, 2019, only two court days from the scheduled  
8 completion of said trial;

9 WHEREAS, on March 14, 2019, Defendants filed a Motion for Leave to File a  
10 Supplemental Memorandum in Support of Defendants’ Motion for Reconsideration  
11 (“Supplemental Motion for Reconsideration”) (ECF No. 337), and the deadline for Plaintiff to  
12 oppose Defendants’ Supplemental Motion for Reconsideration is March 28, 2019;

13 WHEREAS, Plaintiff wishes to extend the deadlines for the Joint Pretrial Order and  
14 Plaintiff’s Opposition to Defendants’ Supplemental Motion for Reconsideration;

15 WHEREAS, Defendant does not oppose these requests.

16 WHEREAS, these requests will not prejudice the overall schedule as the Court has not yet  
17 set a trial date;

18 NOW THEREFORE, the parties hereby stipulate and agree to the following:

19 MOTION SCHEDULE

20 1. The deadline for Plaintiff’s Opposition to Defendants Supplemental Motion for  
21 Reconsideration shall be extended to April 11, 2019.

22 ////  
23 ////  
24 ////  
25 ////  
26 ////  
27 ////  
28 ////

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

TRIAL DEADLINES

2. The deadline for the parties' Joint Pretrial order shall be extended to April 23, 2019.

Dated: March 20, 2019

EARLY SULLIVAN WRIGHT  
GIZER & McRAE LLP

By: /s/ Devin A. McRae  
SCOTT E. GIZER  
DEVIN A. MCRAE  
Attorneys for Plaintiff

Dated: March 20, 2019

QUINN EMANUEL URQUHART & SULLIVAN  
LLP

By: /s/ Tara Lee  
TARA LEE  
KEITH FORST  
DANIEL MACH  
Attorneys for Defendants

**IT IS SO ORDERED.**

Dated this 22nd day of March, 2019

  
UNITED STATES MAGISTRATE JUDGE

1 **CERTIFICATE OF SERVICE**

2 I caused the following document(s) to be served to the persons listed below via the Court's Case  
3 Management and Electronic Case Filing (CM/ECF) system:

4 **STIPULATION AND [PROPOSED] ORDER EXTENDING CASE DEADLINES**  
5 **(First Request)**

6 E. Leif Reid

7 *lreid@lrrc.com*

8 Kristen L. Martini

9 *kmartini@lrrc.com*

10 LEWIS ROCA ROTHGERBER CHRISTIE LLP

11 One East Liberty Street, Suite 300

12 Reno, NV 89501

13 Erik C. Alberts, *Pro Hac Vice*

14 *erik.alberts@ealawfirm.net*

15 LAW OFFICES OF ERIK C. ALBERTS

16 5900 Wilshire Boulevard, 26th Floor

17 Los Angeles, California 90036

18 Tara Lee, *Pro Hac Vice*

19 *taralee@quinnemanuel.com*

20 Keith H. Forst, *Pro Hac Vice*

21 *keithforst@quinnemanuel.com*

22 Daniel P. Mach, *Pro Hac Vice*

23 *danielmach@quinnemanuael.com*

24 QUINN EMANUEL URQUHART & SULLIVAN LLP

25 51 Madison Avenue, 22<sup>nd</sup> Floor

26 New York, NY 10010

27 Scott E. Gizer, Esq., Nevada Bar No. 12216

28 *sgizer@earlysullivan.com*

29 EARLY SULLIVAN WRIGHT

30 GIZER & McRAE LLP

31 601 South Seventh Street, 2<sup>nd</sup> Floor

32 Las Vegas, Nevada 89101

33 Devin A. McRae, *Pro Hac Vice*

34 *dmcrae@earlysullivan.com*

35 EARLY SULLIVAN WRIGHT

36 GIZER & McRAE LLP

37 6420 Wilshire Boulevard, 17th Floor

38 Los Angeles, California 90048

39 **I declare under penalty of perjury that the foregoing is true and correct.**

40 DATED this 20<sup>th</sup> day of March 20, 2019.

41 */s/ Esther Silverman*

42 Esther Silverman

