

1 Paul T. Trimmer, Bar Number 9291
 2 trimmerp@jacksonlewis.com
 3 Sarah T. Bassett, Bar Number 12326
 4 sarah.bassett@jacksonlewis.com
 5 **JACKSON LEWIS P.C.**
 6 3800 Howard Hughes Parkway, Suite 600
 7 Las Vegas, Nevada 89169
 8 Telephone: (702) 921-2460
 9 Facsimile: (702) 921-2461
 10 *Attorneys for Defendants*
 11 *Frias Transportation Management;*
 12 *Virgin Valley Cab Company, Inc.; Ace Cab, Inc.;*
 13 *A-N.L.V. Cab Co.; Union Cab Co.; and*
 14 *Vegas-Western Cab, Inc.*

10 **UNITED STATES DISTRICT COURT**
 11 **DISTRICT OF NEVADA**

12 TADIOS TESSEMA, INDIVIDUALLY, and
 13 as the former UNIT CHAIR of the FRIAS
 14 TRANSPORTATION BARGAINING
 15 UNIT, LOCAL 711A, UNITED STEEL,
 16 PAPER AND FORESTRY, RUBBER,
 17 MANUFACTURING, ENERGY, ALLIED
 18 INDUSTRIAL AND SERVICE WORKERS
 19 INTERNATIONAL UNION,

17 Plaintiff,

18 v.

19 UNITED STEEL, PAPER AND
 20 FORESTRY, RUBBER,
 21 MANUFACTURING, ENERGY, ALLIED
 22 INDUSTRIAL AND SERVICE WORKERS
 23 INTERNATIONAL UNION; LEO W.
 24 GERARD; ROBERT LaVENTURE;
 25 MANUEL ARMENTA; CHRIS
 26 YOUNGMARK; ACE CAB, INC.; UNION
 27 CAB CO.; VEGAS-WESTERN CAB, INC.;

26 Defendants.

Case No.: 2:13-cv-01782-APG-VCF

**STIPULATION AND ORDER TO EXTEND
 DISPOSITIVE MOTION DEADLINE**

(Fifth Request)

1 The parties, by and through their respective counsel of record, hereby stipulate and agree
2 as follows:

3 1. On June 16, 2014, this Court entered its Order setting out the discovery plan and
4 scheduling order dates (Dkt. #74).

5 2. This is the fifth request by the parties to amend the Court's June 16, 2014
6 scheduling order.

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8 3. On March 9, 2016, Defendants Frias Transportation Management, Virgin Valley
9 Cab Company, Inc., Ace Cab, Inc., A-N.L.V. Cab Co., Union Cab Co., and Vegas-Western Cab,
10 Inc., (collectively, the "Defendants") served *via* hand delivery, a Fed. R. Civ. P. 11 letter with a
11 Motion for Sanctions attached thereto.

12 4. Plaintiff Tadios Tessema has requested additional time to respond to the
13 Defendants' Fed. R. Civ. P. 11 letter.

14 5. This extension is necessary based on counsels' schedules and the time needed for
15 Plaintiff to respond to Defendants' letter.

16 6. For the above-stated reasons, the parties request that the dispositive motion
17 deadline be extended from March 31, 2016 to April 6, 2016, to accord time for the parties to
18 assess the Defendants' Fed. R. Civ. P. 11 letter.
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20 **PROPOSED SCHEDULE**

21 1. **Dispositive Motions.** The parties shall have through and including April 6, 2016
22 to file dispositive motions.
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This stipulation is sought in good faith and not for the purpose of delay.

Dated this 31st day of March, 2016.

LAW OFFICE OF
DAN WINDER, P.C.

JACKSON LEWIS P.C.

/s/ Dan M. Winder
Dan M. Winder
3507 W. Charleston Blvd.
Las Vegas, Nevada 89102

/s/ Paul T. Trimmer
Paul T. Trimmer
3800 Howard Hughes Parkway, Suite 600
Las Vegas, Nevada 89169

Attorneys for Plaintiffs

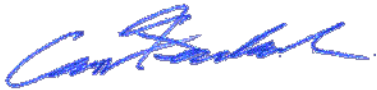
*Attorneys for Defendants
Frias Transportation Management;
Virgin Valley Cab Company, Inc.; Ace Cab, Inc.;
A-N.L.V. Cab Co.; Union Cab Co.; and
Vegas-Western Cab, Inc.*

GILBERT & SACKMAN,
A Law Corporation

/s/ Joshua F. Young
Joshua F. Young
3699 Wilshire Boulevard, Suite 1200
Los Angeles, California 90010-2732

Attorneys for Union Defendants

IT IS SO ORDERED.



Cam Ferenbach, U.S. Magistrate Judge

Dated this 4th day of April, 2016