

THE URBAN LAW FIRM

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**Counsel for Defendant, International Brotherhood
of Electrical Workers, Local Union 357**

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DESERT SUN ENTERPRISES LIMITED)
d/b/a CONVENTION TECHNICAL)
SERVICES,)

CASE NO: 2:13-cv-01885-MMD-NJK

Plaintiff,

vs.

INTERNATIONAL BROTHERHOOD OF)
ELECTRICAL WORKERS, LOCAL UNION)
357, et al.)

**JOINT STIPULATION AND ORDER TO
EXTEND DEFENDANT’S TIME TO
RESPOND TO MOTION FOR
SUMMARY JUDGMENT**

[First Request]

Defendant.

Defendant, International Brotherhood of Electrical Workers, Local Union No. 357 (“Local 357”), by and through its counsel of record, the Urban Law Firm, and Plaintiff, Desert Sun Enterprises Limited d/b/a Convention Technical Services, by and through its counsel of record, Lionel, Sawyer & Collins, hereby stipulate and request the deadline for Defendant’s response to the Plaintiffs Motion for Summary Judgment is extended from June 30, 2014, to July 10, 2014.

This request and stipulation is made for good cause and is not made with any intent to delay these proceedings. The purpose of requesting the extension of time to respond to the Motion for Summary Judgment is the parties completed a meet and confer on June 26, 2014, and they have resolved remaining discovery disputes but Defendant needs additional time to respond.

1 An extension of the time to respond will allow the parties to complete resolution of the discovery
2 dispute. For these reasons, the parties, through their respective counsels, submit there is good cause for
3 extending the response deadline to the Motion for Summary Judgment in this matter and request the
4 Court grant the stipulation to extend the Defendant's response deadline from June 30, 2014, to July 10,
5 2014.

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7 Dated: June 30, 2014

LIONEL SAWYER & COLLINS

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9 /s/ Amy L. Baker _____

Gregory E. Smith, Esq.

Nevada Bar No. 1590

Amy L. Baker, Esq.

Nevada Bar No. 11907

Attorneys for Plaintiff

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13 Dated: June 30, 2014.

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14 /s/ Nathan R. Ring _____

Nathan R. Ring, Esq.

Nevada State Bar No. 12078

Counsel for Defendant, Local 357

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19 **IT IS SO ORDERED:**

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UNITED STATES DISTRICT JUDGE

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22 Dated: June 30, 2014 _____