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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

LEON RICHARDSON,

Plaintiff,

vs.

11 HRHH GAMING SENIOR MEZZ, LLC, a
 12 Delaware Limited Liability Company; BENNIE
 13 MANCINO an individual; DOES I-X; and Roe
 14 Business Entities I - X, inclusive,

Defendants.

STIPULATION AND ORDER TO
 PERMIT DEPOSITION OF DEFENDANT
 BENNIE MANCINO TO BE TAKEN
 OUTSIDE OF DISCOVERY PERIOD
 AND TO EXTEND DEADLINE FOR
 DISPOSITIVE MOTIONS
 [FIRST REQUEST]

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17 It is hereby stipulated by and between the parties, through their respective counsel, that Plaintiff,
 18 LEON RICHARDSON, may take the deposition of Defendant Bennie Mancino outside of the
 19 discovery period set forth in the court's previous scheduling order (Dkt. #49), specifically on August 28,
 20 2015, and as a result of this deposition that the deadline for parties to file dispositive motions shall be
 21 extended by 45 days to Monday, October 12, 2015. This stipulation is submitted and based upon the
 22 following:

- 23 1. That Plaintiff's counsel set the Deposition for Defendant Bennie Mancino for July 21,
 24 2015 at counsel's office in Las Vegas;
- 25 2. That Mancino's counsel disputed that the Plaintiff could require Mancino to travel to
 26 Las Vegas for deposition because subsequent to Mancino being served the Summons
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1 and Complaint in this case, which occurred while he was living and working in Las
2 Vegas, Mancino moved to London, Ohio where he now resides and works;

3 3. The Parties met and conferred and exchanged correspondence on this issue. In the end
4 it was agreed that the deposition would be conducted by remote means pursuant to
5 FRCP Rule 30(b)(4) with Mr. Mancino appearing for deposition with his counsel in
6 Ohio and counsel for Plaintiff taking the deposition by remote means from Las Vegas.
7 Counsel for Defendant HRRHH Gaming Senior Mezz, LLC can choose whichever
8 forum she wishes to attend;

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10 4. With workloads and summer vacation plans, and particularly due to the need to
11 coordinate the remote means and arrange for travel days for Mancino's counsel, the
12 Parties have agreed, and request that the court approve, the taking of this one
13 deposition outside of the currently scheduled discovery period which ends on July 27,
14 2015. The Parties have agreed that the deposition date shall be moved from July 21,
15 2015 and shall instead take place on August 28, 2015.

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17 5. The present dispositive motion deadline is August 26, 2015 (Dkt. #49). As a result of
18 the rescheduling of Defendant Mancino's deposition, the Parties have agreed, and
19 request that the court approve, the extension of the dispositive motion deadline. The
20 Parties request that the Court grant the extension to 45 days after Defendant Mancino's
21 deposition which would be to Monday, October 12, 2015.

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1 6. That this request is made in good faith and not for purpose of delay.
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4 DATED this 21st day of July, 2015.
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6 /s/ James P. Kemp
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8 James P. Kemp, Esq.
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12 Attorney for Plaintiff

13 /s/ Deverie Christensen
14

15 Deverie Christensen, Esq.
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19 Attorneys for Defendant HRHH

20 /s/ Bruce C. Young
21

22 Bruce C. Young, Esq.
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IT IS SO ORDERED


MAGISTRATE JUDGE

Dated: July 24, 2015