

DAVIS WRIGHT TREMAINE LLP

1 JEFF SILVESTRI
 Nevada Bar No. 5779
 2 McDONALD CARANO WILSON LLP
 2300 W. Sahara Avenue, Suite 1200
 3 Las Vegas, NV 89102
 Telephone: (702) 873-4100
 4 Fax: (702) 873-9966
 E-mail: jsilvestri@mcdonaldcarao.com

5
 6 KENNETH E. PAYSON*
 Washington Bar No. 26369
 7 JAMES HARLAN CORNING*
 Washington Bar No. 45177
 8 DAVIS WRIGHT TREMAINE LLP
 1201 Third Avenue, Suite 2200
 9 Seattle, Washington 98101-3045
 Telephone: (206) 622-3150
 10 Facsimile: (206) 757-7700
 Email: kennethpayson@dwt.com
jamescorning@dwt.com

11 *Attorneys for Defendants*

12 * Admitted *pro hac vice*.

13
 14 **UNITED STATES DISTRICT COURT**
 15 **DISTRICT OF NEVADA**

17 JEREMY BAUMAN, et al.,
 18 Plaintiffs,
 19 vs.
 20 V THEATER GROUP, LLC; et al.,
 21 Defendants.

Case No. 2:14-cv-01125-RFB-PAL

**STIPULATION AND [PROPOSED]
 ORDER TO EXTEND DEADLINE TO
 ANSWER OR RESPOND TO AMENDED
 COMPLAINTS**

(FIRST REQUEST)

22 BIJAN RAZILOU, et al.,
 23 Plaintiffs,
 24 vs.
 25 V THEATER GROUP, LLC; et al.,
 26 Defendants.

In consolidation with
Case No.: 2:14-cv-01160-RFB-PAL

STIPULATION

Pursuant to Local Rules 6-1, 6-2 and 7-1, all parties through their counsel of record enter into this Stipulation to extend the deadline by which Defendants David Saxe Productions, Inc., David Saxe Productions, LLC, Saxe Theater LLC, V Theater LLC, Saxe Management LLC, and David Saxe (the "Saxe Defendants") must answer or respond to the Amended Complaints filed by Plaintiffs Jeremy Bauman and Bijan Razilou. This is the first request for an extension. To facilitate the prompt service of new defendant Saxe Theater LLC, and to ensure the Saxe Defendants share a single, unified deadline for responding to both of the Amended Complaints, the parties stipulate and jointly ask the Court to continue the deadline to **September 28, 2015**.

Defendant Saxe Theater LLC waives and acknowledges service of the Amended Complaints, their summons, and Plaintiff Bauman's Second Jury Demand.

Stipulated and respectfully submitted this 14th day of September, 2015, by:

/s/ Albert H. Kirby

Albert H. Kirby
Washington Bar No. 40187
Admitted Pro Hac Vice
SOUND JUSTICE LAW GROUP, PLLC
936 North 34th Street, Suite 300
Seattle, Washington 98103

and

Philip S. Aurbach
Nevada Bar No. 1501
Candice E. Renka
Nevada Bar No. 11447
MARQUIS AURBACH COFFING
10001 Park Run Drive
Las Vegas, Nevada 89145

Attorneys for Plaintiff Jeremy Bauman

/s/ Matthew R. Mendelsohn

Matthew R. Mendelsohn
New Jersey Bar No. 015582005
Admitted Pro Hac Vice
MAZIE SLATER KATZ & FREEMAN, LLC

/s/ James Harlan Corning

Kenneth E. Payson
Washington Bar No. 26369
Admitted Pro Hac Vice
James Harlan Corning
Washington Bar No. 45177
Admitted Pro Hac Vice
DAVIS WRIGHT TREMAINE LLP
1201 Third Avenue, Suite 2200
Seattle, WA 98101

and

Jeff Silvestri
Nevada Bar No. 5779
McDONALD CARANO WILSON LLP
2300 W. Sahara Avenue, Suite 1200
Las Vegas, NV 89102

Attorneys for the Saxe Defendants

1 103 Eisenhower Parkway
2 Roseland, New Jersey 07068

3 *and*

4 Payam Shahian
5 California Bar No. 228406
6 *Admitted Pro Hac Vice*
7 STRATEGIC LEGAL PRACTICES, APC
8 1875 Century Park East, Suite 700
9 Los Angeles, California 90067

10 *and*

11 Dennis L. Kennedy
12 Nevada Bar No. 14625
13 Paul C. Williams
14 Nevada Bar No. 12524
15 BAILEY KENNEDY
16 8984 Spanish Ridge Avenue
17 Las Vegas, Nevada 89148

18 *Attorneys for Plaintiff Bijan Razilou*

19 **ORDER**

20 For the reasons stated in the parties' Stipulation, the Court approves the parties' Stipulation
21 and Orders as follows:

22 1. The deadline by which the Saxe Defendants must answer or otherwise respond to
23 the Amended Complaints is extended to **September 28, 2014.**

24 **IT IS SO ORDERED.**

25 
26 UNITED STATES MAGISTRATE JUDGE

27 DATED: September 24, 2015

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

Respectfully submitted by:

/s/ James Harlan Corning
Kenneth E. Payson
Washington Bar No. 26369
Admitted *Pro Hac Vice*
James Harlan Corning
Washington Bar No. 45177
Admitted *Pro Hac Vice*
DAVIS WRIGHT TREMAINE LLP
1201 Third Avenue, Suite 2200
Seattle, WA 98101

and

Jeff Silvestri
Nevada Bar No. 5779
McDONALD CARANO WILSON LLP
2300 W. Sahara Avenue, Suite 1200
Las Vegas, NV 89102

Attorneys for the Saxe Defendants

CERTIFICATE OF SERVICE

I hereby certify that on September 14, 2015, I served a copy of the foregoing
**STIPULATION AND [PROPOSED] ORDER TO EXTEND DEADLINE TO ANSWER OR
RESPOND TO AMENDED COMPLAINTS** upon each of the parties by electronic mail
pursuant to the Stipulated Discovery Plan in this matter (Dkt. 35), addressed to:

Attorney	Party Represented	Email
Albert H. Kirby	Plaintiff Jeremy Bauman	ahkirby@soundjustice.com
Candice E. Renka	Plaintiff Jeremy Bauman	crenka@maclaw.com jrodionova@maclaw.com
Dennis L. Kennedy	Plaintiff Bijan Razilou	dkennedy@baileykennedy.com
Paul C. Williams	Plaintiff Bijan Razilou	pwilliams@baileykennedy.com smurnane@baileykennedy.com
Matthew R. Mendelsohn	Plaintiff Bijan Razilou	mmendelsohn@mskf.net
Payam Shahian	Plaintiff Bijan Razilou	pshahian@slpattorney.com

/s/ James Harlan Corning
James Harlan Corning