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 8 *Case Peter VanVeen and*  
 9 *Case VanVeen dba Lazevee Farms, Inc.*

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 MARIA GARCIA HERNANDEZ,  
 13 Plaintiff,

14 vs.

15 CASE PETER VANVEEN, an individual;  
 16 CASE VANVEEN, dba LAZEVEE FARMS,  
 17 INC., a California corporation; DOES I  
 through V, inclusive, and ROE  
 CORPORATIONS I through V, inclusive,

18 Defendants.

CASE NO. 2:14-cv-01493-JCM-CWH

**STIPULATION AND [PROPOSED] ORDER  
 TO EXTEND TIME FOR PARTIES TO FILE  
 JOINT PRE-TRIAL ORDER (FIFTH)**

19 **STIPULATION AND PROPOSED ORDER**

20 Pursuant to Local Rules 6-1 and 26-4, the parties, by and through their respective attorneys of  
 21 record, stipulate and agree to extend the deadline to file the Joint Pre-Trial Order by an additional  
 22 Twenty one (21) days.

23 The Court previously ordered the Joint Pre-Trial Order to be filed within thirty (30) days  
 24 following its ruling on final dispositive motions. On September 29, 2017, the Court issued its ruling on  
 25 the parties' respective dispositive motions. [Doc. No. 154], thereby making the Joint Pre-Trial Order due  
 26 on or before October 31, 2017.

27 On December 14, 2017, this Court approved a Stipulation between the parties to extend the time  
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1 to file the Joint Pre-Trial Order until January 15, 2018. [Doc. No. 158] On January 31, 2018, Defendants  
2 filed a Motion to Extend the Time to File the Joint Pre-Trial Order. [Doc. No. 161]. That same day,  
3 Plaintiff's Counsel Todd Terry, Esq., agreed by electronic mail to the one week extension sought in the  
4 Motion. On January 31, 2018, the Court granted the Motion by Minute Order, moving the deadline to  
5 **February 7, 2018.** [Doc. No. 162]. Since that time, the parties have been engaged in substantive  
6 settlement negotiations to resolve this matter in its entirety. Given these discussions, and in order to  
7 avoid potentially unnecessary additional fees and costs if this matter settles, the parties stipulate to move  
8 the Deadline for the Joint Pre-Trial Order three additional weeks, or until February 28, 2018.  
9 Accordingly, the parties have agreed and stipulated to the following deadline:

10 Final Joint Pre Trial Order to be filed by: **February 28, 2018.**

<p>11 Dated: February 7, 2018 12 HALL JAFFE &amp; CLAYTON 13 14 <u>/s/ Steven T. Jaffe</u> 15 STEVEN T. JAFFE, ESQ. 16 Nevada Bar No. 007035 17 DANIEL C. TETREULT, ESQ. 18 Nevada Bar No. 011473 19 7425 Peak Drive 20 Las Vegas, NV 89128 <i>Attorney for Defendants</i> <i>Case Peter VanVeen and</i> <i>Case VanVeen dba Lazevee Farms, Inc.</i></p>	<p>Dated: February 7, 2018 CHRISTIANSEN LAW OFFICES  <u>/s/ Keely Perdue</u> Peter S. Christiansen, Esq. Todd Terry, Esq. Keely Perdue, Esq. 810 S. Casino Center Blvd., #104 Las Vegas, Nevada 89101 <i>Attorney for Plaintiff</i></p>
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21 **[PROPOSED] ORDER**


22 In accordance with the stipulation of the parties, the Court orders as follows:

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The Final Joint Pre Trial Order to be filed on or before **February 28, 2018.**

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

Dated: February 9, 2018