

1 STEVEN T. JAFFE, ESQ.
Nevada Bar No. 007035
2 sjaffe@lawhjc.com
DANIEL C. TETREAULT, ESQ.
3 Nevada Bar No. 011473
dtetreault@lawhjc.com

4 **HALL JAFFE & CLAYTON, LLP**
5 7425 PEAK DRIVE
LAS VEGAS, NEVADA 89128
6 (702) 316-4111
FAX (702)316-4114

7 *Attorney for Defendants*
8 *Case Peter VanVeen and*
Case VanVeen dba Lazevee Farms, Inc.

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

11 MARIA GARCIA HERNANDEZ,
12
13 Plaintiff,

14 vs.

15 CASE PETER VANVEEN, an individual;
16 CASE VANVEEN, dba LAZEVEE FARMS,
INC., a California corporation; DOES I
17 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 STAY THE CASE**

19
20 **STIPULATION AND PROPOSED ORDER**

21 Pursuant to Local Rules 6-1 and 26-4, the parties, by and through their respective attorneys of
22 record, stipulate and agree to stay the pendency of this case by forty five days (45) day and to continue
23 the deadline for the parties to file their Joint Pre-Trial order an additional sixty (60) days.

24 This Court has previously granted five extensions for the parties to complete the Joint Pre-Trial
25 Order. The Joint Pre-Trial Order is currently due on February 28, 2018, pursuant to the most recent
26 Stipulation and Order signed by the Court on February 9, 2018. [Doc. No. 164] The most recent
27 Stipulation was sought by the parties in order to allow for substantive settlement negotiations to proceed
28 with the hopes of resolving this matter. The settlement negotiations are ongoing, and the stay will permit

1 the parties to continuing discussions as well as permit Plaintiff to address related issues with third parties
2 that must be resolved as part of the potential settlement.

3 For these reasons, and in order to avoid potentially unnecessary additional fees and costs if this
4 matter settles, the parties hereby stipulate stay this case forty-five (45) days, or April 9, 2018 and
5 continue the deadline for the parties to submit their Joint Pre-Trial order an additional sixty (60) days, or
6 until April 24, 2018.

7 Accordingly, the parties have agreed and stipulated to the following deadline:

8 Case Stayed Until: **April 9, 2018**

9 Final Joint Pre Trial Order to be filed by: **April 24, 2018**

| | |
|---|----------------------------------|
| 10 Dated: February 23, 2018 | Dated: February 23, 2018 |
| 11 HALL JAFFE & CLAYTON | CHRISTIANSEN LAW OFFICES |
| 12 | |
| 13 <u>/s/ Steven T. Jaffe</u> | <u>/s/ Todd Terry</u> |
| 14 STEVEN T. JAFFE, ESQ. | Peter S. Christiansen, Esq. |
| 15 Nevada Bar No. 007035 | Todd Terry, Esq. |
| 16 DANIEL C. TETREAUULT, ESQ. | Keely Perdue, Esq. |
| 17 Nevada Bar No. 011473 | 810 S. Casino Center Blvd., #104 |
| 18 7425 Peak Drive | Las Vegas, Nevada 89101 |
| 19 Las Vegas, NV 89128 | |
| <i>Attorney for Defendants</i> | <i>Attorney for Plaintiff</i> |
| <i>Case Peter VanVeen and</i> | |
| <i>Case VanVeen dba Lazevee Farms, Inc.</i> | |

20 **~~PROPOSED~~ ORDER**

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

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28

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

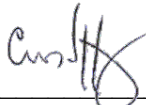
Case Stayed Until:

April 9, 2018

Final Joint Pre Trial Order to be filed by:

April 24, 2018

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

Dated: February 27, 2018