

1 MOLLY M. REZAC, ESQ.
 Nevada Bar No. 7435
 2 Email: mrezac@gordonsilver.com
 100 West Liberty St. Suite 940
 3 Reno, NV 89501
 Tel: (775) 343-7500
 4 Fax: (775) 786-0131

5 *Attorney for Defendant*

6 **UNITED STATES DISTRICT COURT**
 7 **DISTRICT OF NEVADA**

8 JOHN MEGGS, Individually,
 9 Plaintiff,
 vs.
 10 UNIVERSITY SQUARE GROUP ,LTD.,
 11 a Nevada Limited Liability Company,
 12 Defendant.

CASE NO. 2:14-cv-01800-JAD-VCF

STIPULATION AND [PROPOSED]
ORDER TO EXTEND THE DEADLINE IN
THE DEFENDANT’S TIME TO
RESPOND TO COMPLAINT
[SECOND REQUEST]

13
 14
 15
 16 Defendant, UNIVERSITY SQUARE GROUP, LTD., through its attorney of record,
 17 Molly M. Rezac of Gordon Silver, and Plaintiff, JOHN MEGGS, by and through his attorneys of
 18 record, Robert P. Spretnak of the Law Offices of Robert P. Spretnak, and Brandon A. Rotbart of
 19 Fuller, Fuller & Associates, hereby agree and stipulate to allow for a second 20-day extension of
 20 time to respond to complaint up to and including April 23, 2015.

21 The current response date is April 3, 2015. This stipulation is requested so that the
 22 defendant can research the facts and circumstances underlying the claims made in the complaint,
 23 explore settlement of this ADA accessibility matter, and is not intended for delay. The Plaintiff

24 ///

25 ///

26 ///

27 ///

28 ///

1 completed an inspection on March 23, 2015 and a report is forthcoming that will further the
2 parties settlement discussions.

3
4
5
6 Dated this 3rd day of April, 2015.

7 /s/ Molly M. Rezac
8 MOLLY M. REZAC
9 Nevada Bar No. 7435
10 Email: mrezac@gordonsilver.com
11 100 West Liberty St., Suite 940
12 Reno, NV 89501
13 Telephone: (775) 343-7500
14 Facsimile: (775) 348-7250

15 *Attorney for Defendant*

Dated this 3rd day of April, 2015.

/s/ Robert P. Spretnak
ROBERT P. SPRETNAK
Nevada Bar No. 5135
Email: Bob@Spretnak.com
8275 S. Eastern Ave., Suite 200
Las Vegas, NV 89123
Telephone: (702) 454-4900
Facsimile: (702) 938-1055

-and-

/s/ Brandon A. Rotbart
BRANDON A. ROTBART, *pro hac vice*
Email: rotbart@rotbartlaw.com
12000 Biscayne Blvd., Suite 502
N. Miami, FL 33181
Telephone: (305) 891-5199

Attorneys for Plaintiff

16
17
18
19 ***

20
21 **ORDER**

22 Pursuant to the foregoing stipulation by and between the parties, IT IS SO ORDERED.

23
24 DATED this 6th day of April, 2015.

25
26 

27 U.S. Magistrate JUDGE

1 **CERTIFICATE OF SERVICE**

2 Pursuant to FRCP 5(b), I hereby certify that on this 3rd day of April, 2015, I served a true
3 and correct copy of the foregoing **STIPULATION AND [PROPOSED] ORDER TO**
4 **EXTEND THE DEADLINE IN THE DEFENDANT'S TIME TO RESPOND TO**
5 **COMPLAINT [SECOND REQUEST]** by:

6 ___ serving the following parties electronically through CM/ECF as set forth below:

7 ___ faxing a copy to the numbers below;

8 **XX** depositing a copy in the United States mail, first class postage fully prepaid to the
9 persons and addresses listed below:

10
11
12 Robert P. Spretnak
13 Law Offices of Robert P. Spretnak
14 8275 S. Eastern Ave., Suite 200
15 Las Vegas, NV 89123

16
17 Brandon A. Rotbart
18 Fuller, Fuller & Associates
19 12000 Biscayne Blvd., Suite 502
20 N. Miami, FL 33181

21
22
23
24
25
26
27
28
/s/ M'Chele LaBelle
An employee of Gordon Silver