1 2 3 4 5 6 7 8 9	Michael D. Rounds Nevada Bar No. 4734 Ryan J. Cudnik Nevada Bar No. 12948 Steven A. Caloiaro Nevada Bar. No. 12344 WATSON ROUNDS 10000 West Charleston Blvd., Ste. 240 Las Vegas, Nevada 89135 Telephone: (702) 636-4902 Facsimile: (702) 636-4904 E-Mail: mrounds@watsonrounds.com rcudnik@watsonrounds.com scaloiaro@watsonround.com Attorneys for Defendant and Counterclaimant GALAXY GAMING, INC.
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12	UNITED STATES DISTRICT COURT
13	DISTRICT OF NEVADA
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16 17	AGS, LLC, a Delaware limited liability company; RED CARD GAMING, INC., a Nevada corporation, Case No. 2:14-cv-02018-JAD-CWH
18 19	Plaintiffs and Counter-Defendants, v. Stipulation Regarding Rule 26(f) DISCOVERY PLAN AND [PROPOSED] ORDER REGARDING RULE 16(b) SCHEDULING ORDER
20 21	GALAXY GAMING, INC., a Nevada corporation,
22	Defendant and Counterclaimant.
23 24	Pursuant to Rules 26(f) and 26(a)(1)(B)(viii)-(ix) of the Federal Rules of Civil Procedure
25	and Local Rule 26-1, Plaintiffs and Counter-Defendants AGS, LLC ("AGS") and Red Card
23 26	Gaming, Inc. ("Red Card") (collectively, "Plaintiffs"), by and through their counsel, Holland &
20 27	Hart LLP, and Defendant and Counterclaimant Galaxy Gaming, Inc. ("Galaxy" or "Defendant"),
28	by and through its counsel Watson Rounds, hereby stipulate and agree as follows:

1	The parties have filed competing motions for preliminary injunction. (Dkt. #8; Dkt. #15).
2	Defendant also filed a Motion to Compel Arbitration (Dkt. #24), and Plaintiffs filed a Limited
3	Opposition thereto (Dkt. #38) that did not dispute the arbitration provision in the September 21,
4	2012 Asset Purchase Agreement ("APA") between Red Card and Galaxy. All of these motions
5	are scheduled for hearing on April 6, 2015. The current substantive issues in those motions to be
6	decided by this Court relate to (i) the parties' motions for preliminary injunction, which have
7	been fully briefed, and (ii) which tribunal should decide the motions for preliminary injunction.
8	Defendants additionally filed multiple Motions to Seal (Dkt. #14, 19, 23, 47, 54), and Plaintiffs
9	additionally filed a Motion to Strike Defendant's Reply (Dkt. #60).
10	Accordingly, the parties stipulate and agree that discovery in this District Court action
11	should be stayed, and that no Scheduling Order is necessary, at this time. Plaintiffs and
12	Defendant each reserve the right to request, and this Stipulation is without prejudice to such a
13	request (if any), for discovery and/or a scheduling order in this matter should the need arise, for
14	example, due to the parties' competing motions for preliminary injunction and/or Plaintiffs'
15	Motion to Strike.
16	DATED: March 10, 2015
17	HOLLAND & HART LLP WATSON ROUNDS
18	/s/ Ryan Loosvelt Nichool D. Bounda (4724)
19	Robert C. Ryan (7164)Michael D. Rounds (4734)Tamara Reid (9840)Ryan J. Cudnik (12948)
20	5441 Kietzke Lane, Second FloorSteven A. Caloiaro (12344)Reno, Nevada 8951110000 West Charleston Blvd., Suite 240
21	Bryce K. Kunimoto (7781) <i>Las Vegas, Nevada 89135</i> <i>Attorneys for Defendant</i>
22	Ryan Loosvelt (8550) 9555 Hillwood Drive, 2nd Floor
23	Las Vegas, Nevada 89134 Attorneys for Plaintiffs
24	ORDER IT IS SO ORDERED. The parties are directed to file a joint status report within ten days
25	of the district judge deciding either the pending motion to compel arbitration (doc. # 24) or the motions for preliminary injunction (docs. # 8, # 15).
26	DATED: April 17, 2015
27	CmJt
28	United States Magistrate Judge
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1	CERTIFICATE OF SERVICE
2	Pursuant to FRCP 5(b), I certify that I am an employee of Watson Rounds, and that on
3	this date a true and correct copy of the foregoing document, STIPULATION REGARDING
4	RULE 26(f) DISCOVERY PLAN AND [PROPOSED] ORDER REGARDING RULE 16(b)
5	SCHEDULING ORDER, will be served upon counsel of record via electronic mail through the
6	United States District Court's CM/ECF system.
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8	DATED March 10, 2015 <u>/s/ Jeff Tillison</u>
9	An Employee of Watson Rounds
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