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 14 LUXURY SUITES INTERNATIONAL, LLC

15 **UNITED STATES DISTRICT COURT**
 16 **DISTRICT OF NEVADA**

17 ALICE SINANYAN, an individual; JAMES
 18 KOURY, an individual and trustee of the
 Koury Family Trust; and SEHAK TUNA, an
 19 individual, on behalf of themselves and others
 similarly situated,

20 Plaintiffs,

21 vs.

22 LUXURY SUITES INTERNATIONAL, LLC,
 23 a Nevada limited liability company; RE/MAX
 PROPERTIES, LLC, a Nevada limited
 24 liability company; JETLIVING HOTELS,
 LLC, a Nevada limited liability company; JAB
 25 AFFILIATES, LLC, a Nevada limited liability
 company; and DOES 1 through 100, inclusive,

26 Defendants.
 27

Case No. 2:15-CV-00225-GMN-VCF

**STIPULATION AND [PROPOSED]
 ORDER TO STAY CASE DEADLINES AS
 TO PLAINTIFFS AND DEFENDANT
 LUXURY SUITES INTERNATIONAL,
 LLC ONLY**

1 PLEASE TAKE NOTICE, that it is hereby stipulated and requested between Plaintiffs
2 and Defendant Luxury Suites International, LLC (“LSI”), a Nevada limited liability company, by
3 and through counsel of record, that the Court order a stay of all proceedings in this action and all
4 currently-pending deadlines relating to Plaintiffs and Defendant Luxury Suites International,
5 LLC (“LSI” and collectively with Plaintiffs, the “Parties”).

6 The Parties have diligently pursued discovery in this matter and have several expert and
7 lay witness depositions scheduled in the next two weeks prior to the discovery cutoff date. The
8 Parties also have upcoming briefing due relating to LSI’s Motion for Partial Summary Judgment
9 (ECF No. 99). Counsel for the Parties have discussed the benefits of engaging in a second
10 session of mediation with Judge Philip Pro (Ret.) before significant additional resources and time
11 are expended on discovery and motion practice. As a result, the Parties have agreed to suspend
12 litigation efforts and direct their energies and resources instead to mediate in good faith in an
13 effort to reach a settlement of the remaining claims in this action.

14 The Parties are considering and expect to confirm a mediation date with Judge Pro in late
15 August. The Parties request the Court to order an immediate stay of all deadlines relating to the
16 Parties. Any deadlines or pending motions relating to other defendants in this matter shall not be
17 affected by this stipulation. Should efforts to mediate fail, the Parties will notify the Court no
18 later than one week after the mediation and request a reasonable reset of the various deadlines.

19 DATED this 15th day of July, 2016.
20

21 **WOLF, RIFKIN, SHAPIRO,
22 SCHULMAN & RABKIN, LLP**

23 By: /s/ Justin Jones

24 DON SPRINGMEYER, ESQ.

25 Nevada Bar No. 1021

26 JUSTIN JONES, ESQ.

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28 3556 E. Russell Road, Second Floor

Las Vegas, Nevada 89120

Attorneys for Plaintiffs Alice Sinanyan
and James Koury

1 DATED this 15th day of July, 2016.

2 **WILSON, ELSER, MOSKOWITZ,**
3 **EDELMAN & DICKER LLP**

4 By: /s/ J. Scott Burris

5 J. SCOTT BURRIS, ESQ.

6 Nevada Bar No. 10529

7 300 South 4th Street, 11th Floor

8 Las Vegas, NV 89101

9 Attorneys for Defendant Luxury Suites

10 International, LLC

11 **ORDER**

12 **IT IS HEREBY ORDERED** that all pending deadlines relating to Plaintiffs and
13 Defendant Luxury Suites International, LLC ("LSI") are stayed pending mediation.

14 **IT IS FURTHER ORDERED** that Plaintiffs and LSI shall file a joint status report
15 informing the Court of the status of mediation every 60 days, beginning on September 19, 2016.

16 **IT IS FURTHER ORDERED** that LSI's Motion for Partial Summary Judgment (ECF
17 No. 99) is **DENIED** without prejudice.

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19 _____
20 HONORABLE UNITED STATES JUDGE

21 DATED this 20 day of July, 2016.

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CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of July, 2016, a true and correct copy of
**STIPULATION AND [PROPOSED] ORDER TO STAY CASE DEADLINES AS TO
PLAINTIFFS AND DEFENDANT LUXURY SUITES INTERNATIONAL, LLC ONLY**
was served via the United States District Court CM/ECF system on all Parties or persons
requiring notice.

By: /s/ Danielle Fresquez
Danielle Fresquez, an Employee of
WOLF, RIFKIN, SHAPIRO, SCHULMAN &
RABKIN, LLP