

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

**SAO**

Ryan M. Anderson (NV Bar No. 11040)  
Jacqueline Bretell (NV Bar No. 12335)

**MORRIS // ANDERSON**

716 S. Jones Blvd  
Las Vegas, Nevada 89107  
Phone: (702) 333-1111  
Fax: (702) 507-0092

ryan@morrisandersonlaw.com  
jacquie@morrisandersonlaw.com

Michael J. Rusing (AZ Bar 6617) (Pending Pro Hac Vice Admission)  
P. Andrew Sterling (AZ Bar 30471) (Pending Pro Hac Vice Admission)

**RUSING LOPEZ & LIZARDI, PLLC**

6363 North Swan Road, Suite 151  
Tucson, Arizona 85718  
Phone: (520) 792-4800  
Fax: (520) 529-4262  
rusinglopez@rllaz.com  
Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

KRYSTAL CAMPBELL, SHANA  
RAGIN, ASHLEIGH PARK, and JANE  
DOE DANCER, I through V, individually,  
and on behalf of Class of similarly situated  
individuals,

Plaintiffs,

v.

DEAN MARTIN DR - LAS VEGAS,  
LLC, a Nevada Limited Liability Company  
(d/b/a LARRY FLYNT'S HUSTLER  
CLUB, a business organization form  
unknown), LAS VEGAS BISTRO, LLC, a  
Nevada Limited Liability Company,  
MODERN BOOKKEEPING, INC, a  
Michigan Corporation, DOE CLUB  
OWNER, I-X, DOE EMPLOYER, I-X,  
ROE CLUB OWNER, I-X, and ROE  
EMPLOYER, I-X,

Defendants.

CASE NO.: 2:15-cv-00452-GMN-NJK

**STIPULATION AND ORDER TO  
EXTEND BRIEFING SCHEDULE  
(First Request)**

1 IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs by and  
2 through attorneys MORRIS ANDERSON and RUSING LOPEZ & LIZARDI, PLLC, and  
3 Defendants by and through attorneys, JACKSON LEWIS, P.C., that Plaintiffs will be granted  
4 additional time to respond to Defendants' Motion to Compel Arbitration and Dismiss or,  
5 Alternatively Stay the Action Pending Arbitration (Doc. 7 and Doc. 8).  
6

7 This extension is not sought for an improper purpose or to otherwise needlessly delay  
8 these proceedings. As such, the following deadlines are applicable:

9 1. Plaintiffs' will have fourteen (14) calendar days from the date of the Court's  
10 decision regarding jurisdiction under 28 U.S.C. sec. 1331(d)(4). (Doc. 5)  
11

12 2. Thereafter, Defendants' will have fourteen (14) calendar days to file their reply to  
13 Plaintiffs' Opposition stated above.

14 DATED this 1st day of April, 2015.

DATED this 1st day of April, 2015.

15 /s/ Ryan M. Anderson  
16 Ryan M. Anderson (NV Bar No. 11040)  
17 Jacqueline Bretell (NV Bar No. 12335)  
18 **MORRIS // ANDERSON**  
19 716 S. Jones Blvd  
20 Las Vegas, Nevada 89107  
21 Michael J. Rusing (AZ Bar 6617)  
22 P. Andrew Sterling (AZ Bar 30471)  
23 **RUSING LOPEZ & LIZARDI, PLLC**  
24 6363 North Swan Road, Suite 151  
25 Tucson, Arizona 85718  
26 Attorneys for Plaintiffs

/s/ Steven C. Anderson  
Elayan J. Youchah (NV Bar No. 5837)  
Steven C. Anderson (NV Bar No. 11901)  
**JACKSON LEWIS P.C.**  
3800 Howard Hughes Parkway Ste. 600  
Las Vegas, NV 89169  
Attorneys for Defendants

**IT IS SO ORDERED.**

  
Gloria M. Navarro, Chief Judge  
United States District Court

**DATED: 04/15/2015**

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

Submitted by:

/s/ Ryan M. Anderson  
Ryan M. Anderson (NV Bar No. 11040)  
Jacqueline Bretell (NV Bar No. 12335)  
**MORRIS // ANDERSON**  
716 S. Jones Blvd  
Las Vegas, Nevada 89107  
Michael J. Rusing (AZ Bar 6617)  
P. Andrew Sterling (AZ Bar 30471)  
**RUSING LOPEZ & LIZARDI, PLLC**  
6363 North Swan Road, Suite 151  
Tucson, Arizona 85718  
Attorneys for Plaintiffs