David H. Krieger, Esq. NV Bar No. 9086 HAINES & KRIEGER, LLC 8985 S. Eastern Avenue, Suite 130 Henderson, Nevada 89123 Phone: (702) 880-5554 FAX: (702) 385-5518 dkrieger@hainesandkrieger.com

Danny J. Horen, Esq. NV Bar No. 13153 Kazerouni Law Group, APC 7854 W. Sahara Avenue Las Vegas, NV 89117 Telephone: (800) 400-6808x7 Facsimile: (800) 520-5523 danny@kazlg.com

Attorneys for Plaintiff

## UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

## **CHRISTINE KOOPMAN**

Plaintiff,

v.

KOHL'S DEPARTMENT STORES, INC.,

Defendants.

Case No.: 2:15-cv-00462-MMD-CWH

STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO DEFENDANT'S MOTION TO DISMISS

[FIRST REQUEST]

Plaintiff, CHRISTINE KOOPMAN ("Plaintiff"), and Defendant, KOHL'S DEPARTMENT STORES, INC. ("Defendant"), hereby submit the following Stipulation to Extend Time for Plaintiff to Respond to Defendant's Motion to Dismiss. The current deadline is set for June 29, 2015.

- 1. Plaintiff's Complaint was filed on March 12, 2015. [Dkt. No. 1]
- 2. Defendant filed its Motion to Dismiss [Dkt. No. 9] on June 12, 2015.
- 3. The parties are engaged in good faith settlement discussion. Plaintiff and Defendant have agreed to an extension of time of 14 days, up to and including July 13, 2015 for Plaintiff to respond to Defendant's Motion To Dismiss.
- 4. This request is not made for purposes of delay, but rather to allow the parties to explore settlement.

The parties therefore respectfully request this Court enter an order granting an extension of time of 14 days, up to and including July 13, 2015, for Plaintiff to respond to Defendant's Motion to Dismiss.

DATED: June 25, 2015

PISANELLI BICE

KAZEROUNI LAW GROUP, APC

/s/ Jordan Smith Jordan Smith, Esq. 400 S. 7<sup>th</sup> St., Ste. 300 Las Vegas, NV 89101 JTS@pisanellibice.com Attorneys for Defendant /s/ Danny J. Horen

DANNY J. HOREN, ESQ 7854 W. Sahara Avenue Las Vegas, NV 89117 danny@kazlg.com Attorneys for Plaintiff

## IT IS SO ORDERED:

Plaintiff shall have 14 days, up to and including July 13, 2015, to respond to Defendant's Motion to Dismiss.

UNITED STATES DISTRICT COURT JUDGE

DATED: \_\_\_\_\_ June 25, 2015