

**FISHER & PHILLIPS LLP**  
300 S Fourth Street, Suite 1500  
Las Vegas, Nevada 89101

1 FISHER & PHILLIPS LLP  
2 Brian L. Bradford  
3 Nevada Bar No. 9158  
4 300 S. Fourth Street  
5 Suite 1500  
6 Las Vegas, NV 89109  
7 Telephone: (702) 252-3131  
8 Facsimile: (702) 252-7411

9 **Attorneys for Defendant The Primadonna Company LLC**

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 MONIQUE BENNETT, an  
13 individual,  
14  
15 Plaintiff,  
16  
17 v.  
18  
19 THE PRIMADONNA  
20 COMPANY, L.L.C., a Nevada  
21 limited liability company,  
22  
23 Defendant.

Case No.: 2:15-cv-00575-GMN-EJY

**JOINT STIPULATION TO EXTEND  
DISPOSITIVE MOTION DEADLINES  
(THIRD REQUEST)**

19 Plaintiff Monique Bennett (“Plaintiff”) and Defendant, The Primadonna  
20 Company, L.L.C. (“Defendant”), by and through their undersigned counsel, hereby  
21 stipulate and request to extend the deadline for Defendant to respond to Plaintiff’s Motion  
22 for Summary Judgment from February 16, 2020 (ECF 99) to March 18, 2020 and to  
23 extend the deadline for Defendant to file its own dispositive motion from February 7,  
24 2020 (ECF 99) to March 18, 2020. This Stipulation is made in good faith by the parties  
25 to engage in mediation on February 26, 2020, without incurring additional litigation costs  
26 and fees related to the dispositive motions. The parties’ private mediation was originally  
27 scheduled for November 19, 2019, and then rescheduled for January 29, 2020, due to a  
28 conflict with the mediator’s travel schedule. Another conflict arose with the mediator’s

1 travel schedule requiring the rescheduling of the January 29, 2020, mediation. Due to the  
2 repeated cancellations of the mediation by the mediator, the parties agreed to retain a new  
3 mediator for the February 26, 2020, mediation.

|   | <u>Current Deadline</u>      | <u>Proposed Deadline</u> |                |
|---|------------------------------|--------------------------|----------------|
| 4 |                              |                          |                |
| 5 | Dispositive Motion Deadline  | February 7, 2020         | March 18, 2020 |
| 6 | Def.'s Response To Pl.'s MSJ | February 16, 2020        | March 18, 2020 |

7 Dated this 7<sup>th</sup> Day of January 2020.

8 METZ & HARRISON, LLP

FISHER & PHILLIPS LLP

9 By: s/ Sarah Pezeshkpour, Esq.  
10 Jeff A. Harrison, Esq.  
11 Sara Pezeshkpour, Esq.  
12 139 Richmond Street  
13 El Segundo, CA 90245  
14 Attorneys for Plaintiff Monique Bennett

By: s/ Brian L. Bradford, Esq.  
Brian L. Bradford, Esq.  
Nevada Bar No. 9158  
300 S. Fourth Street  
Suite 1500  
Las Vegas, NV 89101  
[bbradford@fisherphillips.com](mailto:bbradford@fisherphillips.com)  
(702) 252-3131  
Attorney for Defendant  
The Primadonna Company LLC

17 **IT IS SO ORDERED.**

18 Dated this 8 day of January, 2020.

19  
20  
21   
22 \_\_\_\_\_  
Gloria M. Navarro, District Judge  
UNITED STATES DISTRICT COURT

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

**CERTIFICATE OF SERVICE**

Pursuant to Fed. R. Civ. P. 5(b), I hereby certify that on January 7, 2020, I did cause a true copy of the foregoing **JOINT STIPULATION TO EXTEND DISPOSITIVE MOTION DEADLINES (THIRD REQUEST)** to be served via the CM/ECF filing system to all parties on the service list:

Elliott S. Blut, Esq.  
Blut Law Group, PC  
300 S. Fourth Street, Suite 701  
Las Vegas, NV 89101  
P: 702-384-1050  
F: 702-384-8565  
E: [eblut@blutlaw.com](mailto:eblut@blutlaw.com)  
Attorney for Plaintiff Monique Bennett

Sara Pezeshkpour, Esq.  
Metz & Harrison, LLP  
139 Richmond Street  
El Segundo, CA 90245  
P: 310-648-8755  
F: 310-648-8734  
E: [jharrison@metzharrison.com](mailto:jharrison@metzharrison.com)  
E: [spez@metsharrison.com](mailto:spez@metsharrison.com)  
Attorneys for Plaintiff Monique Bennett

By: s/ Stacey L. Grata  
An Employee of Fisher & Phillips LLP