DANIEL R. MCNUTT (SBN 7815) 1 MATTHEW C. WOLF (SBN 10801) CARBAJAL & MCNUTT, LLP 2 625 South Eighth Street Las Vegas, Nevada 89101 3 Tel.: (702) 384-1170 / Fax.: (702) 384-5529 drm@cmlawnv.com 4 mcw@cmlawnv.com 5 Attorney for Defendants Corporation of the President of The Church of Jesus 6 Christ of Latter-day Saints and 7 Corporation of the Presiding Bishop of The Church of Jesus Christ` 8 of Latter-day Saints 9 UNITED STATES DISTRICT COURT 10 DISTRICT OF NEVADA 11 KRISHAN LAL. KULDIP KAUR, ) Case No. 2:15-cv-00658-JCM-GWF 12 KANCHAN PAUL, and RANJANA PAUL. 13 STIPULATION AND [PROPOSED] Plaintiffs. ORDER TO STAY DISCOVERY 14 AND MOTION PRACTICE PENDING A PRIVATE vs. 15 MEDIATION BETWEEN THE MARINA LONG, CORPORATION OF **PARTIES** 16 THE PRESIDENT OF THE CHURCH OF 17 **IESUS** CHRIST OF LATTER-DAY SAINTS. CORPORATION OF 18 PRESIDING BISHOP OF THE CHURCH OF JESUS CHRIST OF LATTER DAY 19 SAINTS, DOES I through X, inclusive; and ROE CORPORATIONS I through X, 20 inclusive, 21 Defendants. 22 23 Defendants Corporation of the President of The Church of Jesus Christ of 24 Latter-day Saints ("COP") and Corporation of the Presiding Bishop of The Church of Jesus 25 Christ of Latter-day Saints ("CPB") (COP and CPB are collectively "The Church 26 Defendants"), through the law firm Carbajal & McNutt LLP, Plaintiffs Krishan Lal, Kuldip 27

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Kaur, Kanchan Paul, and Ranjana Paul (collectively "Plaintiffs"), through the Law Office of

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Julie A. Mersch and Craig P. Kenny & Associates, Counter-Defendant Krishan Lal, through the Harper Law Group, and Defendant Marina Long, through the law firm Kolesar & Leatham, hereby stipulate to stay discovery and motion practice, so as to afford adequate time for the Parties to prepare for and participate in a private mediation.

The Parties hereby stipulate and agree to the following terms:

- 1. The Parties shall participate in a private mediation in Las Vegas, Nevada (hereinafter, the "Mediation") in a good faith effort settle and resolve all claims in this litigation.
  - 2. The Mediation shall be conducted by Gene Porter.
- 3. The Mediation shall occur no sooner than the middle of February 2016, subject to the availability of the Parties and their representatives.
- 4. The specific conditions and particulars of the private mediation have been agreed to by the parties and are not set forth herein.
- 5. To accommodate the Mediation, the Parties stipulate and agree to stay all existing discovery deadlines, ECF No. 37, and to refrain from filing any motions until March 1, 2016. Good cause exists for the entrance of this stay. The stay will maximize the chance of this case being resolved at the Mediation by (1) allowing the Parties to focus their attention upon the Mediation, and (2) minimizing the Parties' fees and costs prior to the Mediation.
- 6. On March 1, 2016, the Parties shall file a status report advising this Court whether a settlement agreement has been reached. If no settlement agreement has been reached, then on that date, the Parties also will submit a stipulation and proposed order to extend the existing discovery deadlines. (ECF No. 37.) Discovery deadlines that have already expired as of the date of this Stipulation and Order shall not be revived.
  - 7. This request is made in good faith and not for purposes of delay.

1 IT IS SO STIPULATED on December 31, 2015. 2 CARBAJAL & MCNUTT, LLP **KOLESAR & LEATHAM** 3 /s/ William Schuller /s/ Matt Wolf 4 DANIEL R. MCNUTT (SBN 7815) WILLIAM D. SCHULLER (SBN 11271) 5 MATTHEW C. WOLF (SBN 10801) RYAN S. PETERSEN, ESQ. (SBN 10715) 625 South Eighth Street 400 S. Rampart Blvd, Suite 400 6 Las Vegas, Nevada 89145 Las Vegas, Nevada 89101 7 8 Attorneys for Defendants Corporation of the Attorneys for Defendant Marina Long President of The Church of Jesus Christ of Corporation of the Latter-day Saints and 10 Presiding Bishop of The Church of Jesus Christ of Latter-day Saints 11 12 HARPER LAW GROUP THE LAW OFFICE OF JULIE A. MERSCH 13 14 /s/ James Harper /s/ Julie Mersch JAMES E. HARPER (SBN 9822) JULIE A. MERSCH (SBN 4695) 15 1935 Village Center Circle 701 S.7th Street 16 Las Vegas, Nevada 89134 Las Vegas, NV 89101 17 Attorney for Plaintiffs Attorney for Counter-Defendant Krishan Lal 18 19 CRAIG P. KENNY & ASSOCIATES 20 <u>/s/ Larry Mittin</u> LEON R. SYMANSKI (SBN 8686) LAWRENCE E. MITTIN (SBN 5428) 21 501 S. 8th Street 22 Las Vegas, NV 89101 23 Attorneys for *Plaintiffs* IT IS SO ORDERED: 24 25 GEORGE OLEY, JA. 26 United States Magistrate Judge 27 28 January 4, 2016 DATED: