

EDWARD W. SUH
 CA Bar No. 265356
Admitted Pro Hac Vice
LAW OFFICES OF MICHAEL K. SUH & ASSOCIATES
 3810 Wilshire Boulevard, Suite 1212
 Los Angeles, Ca 90010
 Telephone: (213) 385-7347
 Facsimile: (213) 383-3323
 Email: Edward@suhnassoclaw.com

Attorneys for Plaintiffs

RICHARD H. LEE
 CA Bar No. 223553
Admitted Pro Hac Vice
SALISIAN | LEE LLP
 550 South Hope Street, Suite 750
 Los Angeles, California 90071-2627
 Telephone: (213) 622-9100
 Facsimile: (800) 622-9145
 Email: richard.lee@salisianlee.com

Attorneys for Defendants

UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

RAMA SOU; TAI BUI; and SCOTT
 ZIMMERMAN,

Plaintiffs,

vs.

MICHAEL BASH; JEREMY BASH;
 BERKLEY ENTERPRISES, INC.;
 PEPPERDINE ENTERPRISES, INC.;
 NINETY-FIVE FORT APACHE COMPLEX,
 LLC; ROYAL VIEW, LLC; and DOES 1
 through 20, inclusive,

Defendants.

Case No.: 2:15-cv-00698-APG-VCF

**STIPULATION TO EXTEND TIME FOR
 DEFENDANTS TO RESPOND TO SECOND
 AMENDED COMPLAINT (First Request)**

[LR 6-1, 6-2]

ORDER

1 TO THE HONORABLE COURT, ALL PARTIES, AND THEIR COUNSEL OF
2 RECORD:

3 Plaintiffs Rama Sou, Tai Bui, and Scott Zimmerman (collectively, "Plaintiffs"), on the
4 one hand, and defendants Michael Bash, Jeremy Bash, Berkley Enterprises, Inc., Pepperdine
5 Enterprises, Inc., Ninety-Five Fort Apache Complex, LLC, and Royal View, LLC (collectively,
6 "Defendants"), on the other hand, by and through their respective counsel, hereby stipulate as
7 follows:

8 WHEREAS, on February 24, 2016, a hearing was held before the Honorable Andrew
9 Gordon regarding Defendants' Motion to Dismiss Plaintiffs' First Amended Complaint and
10 Plaintiffs' Motion to Amend Complaint. Plaintiffs' Motion to Amend Complaint was denied
11 without prejudice, and Defendants' Motion to Dismiss was granted with leave to amend.
12 Plaintiffs were granted 21 days' leave to file a Second Amended Complaint ("SAC"), which was
13 filed on March 16, 2016. Defendants' response to Plaintiffs' SAC is due on April 4, 2016.

14 WHEREAS, Plaintiffs' and Defendants' respective counsel agreed to an approximate
15 thirty-day extension for Defendants to respond to the SAC.

16 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the parties,
17 through their respective counsel of record, that good cause exists and it is in the best interests of
18 all parties to extend Defendants' deadline to file and serve any response to the SAC to May 4,
19 2016.

1 Dated: April 1, 2016

LAW OFFICES OF MICHAEL K. SUH &
ASSOCIATES

2
3 By: /s/ Edward W. Suh

4 Edward W. Suh
5 CA Bar No. 265356
6 *Admitted Pro Hac Vice*

7 Gordon R. Goolsby
8 NV Bar No. 11578
9 GOOLSBY LAW, LTD.

Attorneys for Plaintiffs
Rama Sou, Tai Bui, and Scott Zimmerman

10 Dated: April 1, 2016

SALISIAN | LEE LLP

11
12 By: /s/ Richard H. Lee

13 Richard H. Lee
14 CA Bar No. 223553
15 *Admitted Pro Hac Vice*


16 Michael B. Lee
17 NV Bar No. 10122
18 MICHAEL B. LEE, P.C.

19 Attorneys for Defendants
20 Michael Bash, Jeremy Bash, Berkley Enterprises,
21 Inc., Pepperdine Enterprises, Inc., Ninety-Five Fort
22 Apache Complex, LLC, and Royal View, LLC

23 **ORDER**

24 IT IS SO ORDERED.

25 Dated: April 4, 2016.

26
27 
28 UNITED STATES DISTRICT JUDGE