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9 **UNITED STATES DISTRICT COURT**
 10 **DISTRICT OF NEVADA**

11 FRANK BACCALA,

12 Plaintiff;

13 vs.

14 ELDORADO RESORTS CORPORATION,
 a Florida corporation; MICHAEL MARRS;
 15 KRISTEN BECK; DOMINIC TALEGHANI;
 16 AND DOES 1-50, inclusive;

17 Defendants.

Case No.: 2:15-cv-00752-RFB-PAL

**STIPULATION AND ORDER TO
 EXTEND TIME TO SUBMIT
 PRELIMINARY EARLY NEUTRAL
 EVALUATION ASSESSMENT
 STATEMENTS**

18 Pursuant to LR 6-1, 6-2 and 7-1 and 26-4, Plaintiff Frank Baccala (“Plaintiff”) and
 19 Defendants Eldorado Resorts Corporation (“Eldorado”), Michael Marrs (“Marrs”), Kristen Beck
 20 (“Beck”), and Dominic Taleghani (“Taleghani”) (sometimes hereinafter referred to collectively
 21 as “Defendants”) by and through their undersigned counsel, hereby stipulate and agree to extend
 22 the time for the Parties to submit their Preliminary Early Neutral Evaluation Assessment
 23 Statements. Good cause exists for the proposed extension of time for the Parties to submit their
 24 Preliminary Early Neutral Evaluation Assessment Statements. Defendants filed Motions for
 25 Summary Judgment in four related matters on 3/16/2016. Each Motion for Summary Judgment
 26 is lengthy and has extensive Exhibits. Reviewing and identifying relevant evidence for each of
 27 Defendants’ arguments amidst hundreds of pages of disclosures, deposition transcripts, etc., has
 28 proved to be much more time consuming than anticipated. Efforts to respond to the Motions

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1 have impeded Plaintiff's ability to prepare the Preliminary Early Neutral Evaluation Assessment
2 Statements. In an effort to ensure Plaintiff can fully provide complete information on each case,
3 the Parties have agreed that the deadline to submit the Preliminary Early Neutral Evaluation
4 Assessment Statements should be extended in the following manner:

- 5 • All Parties shall submit their Preliminary Early Neutral Evaluation Assessment
6 Statements to Judge Foley's Chambers as per the Order dated March 14, 2016
7 (Doc. # 38) no later than **Friday, April 22, 2016**.

8
9 Dated this 15th day of April, 2016.

Dated this 15th day of April, 2016.

10 WATKINS & LETOFSKY, LLP


OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.

11
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18 **ORDER**

19 IT IS SO ORDERED.

20
21 
22 GEORGE FOLEY, JR.
United States Magistrate Judge

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24 Dated: April 18, 2016

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**STIPULATION AND ORDER TO EXTEND TIME TO SUBMIT PRELIMINARY
EARLY NEUTRAL EVALUATION ASSESSMENT STATEMENTS**