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Daniel R. Watkins 1 Nevada State Bar No. 11881 DW@wl-llp.com 2 Brian S. Letofsky 3 Nevada State Bar No. 11836 Brian.Letofsky@wl-llp.com 4 WATKINS & LETOFSKY, LLP 400 South Fourth Street, Suite 280 5 Las Vegas, NV 89101 6 Office: (702) 385-5191; Fax: (702) 385-7282 7 Attorneys for Plaintiff, SAEED AZIZI 8 9 UNITED STATES DISTRICT COURT 10 DISTRICT OF NEVADA 11 SAEED AZIZI, Case No.: 2:15-cv-00755-RFB-PAL 12 Plaintiff; STIPULATION AND ORDER TO EXTEND TIME TO SUBMIT 13 PRELIMINARY EARLY NEUTRAL VS. **EVALUATION ASSESSMENT** 14 ELDORADO RESORTS CORPORATION, **STATEMENTS** a Florida corporation; MICHAEL MARRS; 15 KRISTEN BECK; DOMINIC TALEGHANI; AND DOES 1-50, inclusive; 16 Defendants. 17 18 Pursuant to LR 6-1, 6-2 and 7-1 and 26-4, Plaintiff Saeed Azizi ("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

Defendants' arguments amidst hundreds of pages of disclosures, deposition transcripts, etc., has

proved to be much more time consuming than anticipated. Efforts to respond to the Motions

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 Assessme	
6	Statements to Judge Foley's Chambers as per the Order dated March 14, 201	
7	(Doc. # 39), no later than Friday, April 22, 2016 .	
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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	/s/ Daniel R. Watkins	/s/ Jill Garcia
12	Daniel R. Watkins	Anthony L. Martin
13	Brian S. Letofsky 400 S. Fourth Street	Jill Garcia Brian L. Bradford
14	Suite 280 Las Vegas, NV 89101	3800 Howard Hughes Parkway Suite 1500
15	Telephone: 702-385-5191	Las Vegas, NV 89169
16	Attorneys for Plaintiff	Telephone: 702-369-6800 Attorneys for Defendants
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18		<u>ORDER</u>
19	IT IS SO ORDERED.	
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21		GEORGE POLEY, JR.
22		United States Magistrate Judge
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24		Dated: April 18, 2016
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