

OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.  
WELLS FARGO TOWER  
SUITE 1500, 3800 HOWARD HUGHES PARKWAY  
LAS VEGAS, NV 89169  
TELEPHONE: 702.369.6800

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ANTHONY L. MARTIN, ESQ.  
Nevada Bar No. 8177  
[anthony.martin@ogletreedeakins.com](mailto:anthony.martin@ogletreedeakins.com)  
JILL GARCIA, ESQ.  
Nevada Bar No. 7805  
[jill.garcia@ogletreedeakins.com](mailto:jill.garcia@ogletreedeakins.com)  
JAMES E. BERCHTOLD, ESQ.  
Nevada Bar No. 5874  
[jim.berchtold@ogletreedeakins.com](mailto:jim.berchtold@ogletreedeakins.com)  
OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.  
Wells Fargo Tower  
Suite 1500  
3800 Howard Hughes Parkway  
Las Vegas, NV 89169  
Telephone: 702.369.6800  
Fax: 702.369.6888  
  
Attorneys for Defendant Eldorado Resorts Corporation  
and Michael Marrs

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

DOUGLAS BULL,  
  
Plaintiff,  
  
vs.  
  
ELDORADO RESORTS CORPORATION, a  
Florida corporation; MICHAEL MARRS;  
BRUCE POLANSKY; KRISTEN BECK;  
DOMINIC TALEGHANI; JAMES  
GRIMES; AND DOES 1-50, inclusive;  
  
Defendants.

Case No.: 2:15-cv-00756-RFB-PAL

**STIPULATION AND ORDER TO  
EXTEND TIME TO FILE DISPOSITIVE  
MOTIONS AND RESPONSES AND  
REPLIES THERETO**

(FIRST REQUEST)

Pursuant to LR IA 6-1, LR IA 6-2, and LR 7-1 and 26-4, Plaintiff Douglas Bull (“Plaintiff”) and Defendants Eldorado Resorts Corporation (“Eldorado”) and Michael Marrs (“Marrs”) (collectively “Defendants”), by and through their undersigned counsel, hereby stipulate and agree to this first request for extension of time for the parties to file dispositive motions in this action, along with related responses and replies. Pursuant to the Court's July 1, 2016, Order for

1 Extension of Discovery Deadlines (ECF No. 47), the current deadline for filing dispositive motions  
2 in this case is August 30, 2016 (see id. at 6). The parties have completed all discovery in this  
3 matter, and good cause exists for the proposed extension based upon the following:

4 On August 11, 2016, the parties participated in an Early Neutral Evaluation Conference  
5 (“ENE”) before the Honorable Magistrate Judge George Foley, Jr., in the related case of Villarreal  
6 v. Eldorado Resorts Corp. et al., Case No. 2:14-cv-01415-RFB-PAL. (See Mins. of Proceedings,  
7 ECF No. 97.) Although no settlement was reached, the parties advised the Court that a global  
8 settlement conference and continuation of the ENE session would potentially advance the goal of  
9 settlement. The Court has, therefore, set a global settlement conference for October 12 and 13,  
10 2016, again before Magistrate Judge Foley. (See id.) An extension of the deadline to file  
11 dispositive motions, responses, and replies in this case similarly advances the goal of settlement by  
12 allowing the parties to conserve resources pending those settlement discussions and to streamline  
13 and focus the litigation and issues leading up to that conference. Based upon the foregoing, the  
14 parties have agreed that the dispositive motion deadlines should be extended in the following  
15 manner:  
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- 17 • Defendants shall file their dispositive motions no later than **September 15, 2016**;
- 18 • Plaintiff shall file any response to Defendants' motion no later than **November 15,**  
19 **2016**;
- 20 • Defendants shall file their reply no later than **December 15, 2016**.

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This stipulation is not brought for purposes of delay or any other improper purpose.

Dated this 12th day of August, 2016.

Dated this 12th day of August, 2016.

WATKINS & LETOFSKY, LLP

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

/s/ Dan Watkins

/s/ Jill Garcia

Daniel R. Watkins  
Brian S. Letofsky  
400 S. Fourth Street  
Suite 280  
Las Vegas, NV 89101  
Telephone: 702-385-5191  
Attorneys for Plaintiff Douglas Bull

Anthony L. Martin  
Jill Garcia  
James E. Berchtold  
3800 Howard Hughes Parkway  
Suite 1500  
Las Vegas, NV 89169  
Telephone: 702-369-6800  
Attorneys for Defendants Eldorado Resorts  
Corporation and Michael Marrs

**ORDER**

IT IS SO ORDERED.

  
UNITED STATES MAGISTRATE JUDGE

August 17, 2016

DATED