

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

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

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)  
SHELLEY L. MURRAY, ESQ.  
Nevada Bar No. 12831  
[shelley.murray@ogletreedeakins.com](mailto:shelley.murray@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 Defendants Eldorado Resorts Corporation  
and Michael Marrs

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

TERESA LEIGH BOUCH,  
  
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-01023-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, LR 7-1 and LR 26-4, Plaintiff Teresa Leigh Bouch (“Plaintiff”) and Defendants Eldorado Resorts Corporation and Michael 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 September 22, 2016, Order for Extension of

1 Discovery Deadlines (ECF No. 48), the current deadline for filing dispositive motions in this case  
2 is January 30, 2017, (see *id.* at 8). The parties have completed all discovery in this matter, and  
3 good cause exists for the proposed extension based upon the following:

4 As the Court is aware, this case is one of thirty-three related lawsuits sitting before this  
5 Court. Recognizing the complexity of litigating these lawsuits simultaneously, the parties agreed  
6 to divide the cases into five groups and stagger deadlines in order to streamline the litigation  
7 process and avoid overlapping dispositive motion deadlines. Defendants' filed Motions for  
8 Summary Judgment on September 1, 2016 and September 15, 2016, in Group II cases.  
9 Unfortunately, response and reply briefing has been delayed and will not be completed before the  
10 deadline for filing dispositive motions in this case.<sup>1</sup>

11  
12 Based upon the foregoing, the parties have agreed that the dispositive motion deadlines should  
13 be extended by forty-five (45) days in the following manner:

- 14 • Defendants shall file their dispositive motions no later than **March 16, 2017**;
- 15 • Plaintiff shall file any response to Defendants' dispositive motions no later than  
16 **April 17, 2017 (30<sup>th</sup> day is Saturday, April 15, 2017)**;
- 17 • Defendants shall file their reply no later than **May 17, 2017**.

18 //

19 //

20 //

21 //

22 //

23 //

24 //

25 //

26 //

---

27 <sup>1</sup> This request for additional time is also addressed in Defendants' Limited Response to Plaintiff's Motion  
28 for an Extension of Time.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

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

Dated this 20th day of December, 2016.

WATKINS & LETOFSKY, LLP

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

/s/ Daniel R. Watkins

/s/ Jill Garcia

Daniel R. Watkins  
Brian S. Letofsky  
8215 South Eastern Avenue  
Suite 265  
Las Vegas, NV 89123  
Telephone: 702-487-7574  
Attorneys for Plaintiff Teresa Leigh Bouch

Anthony L. Martin  
Jill Garcia  
Shelley L. Murray  
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

December 28, 2016

DATED

27914563.1