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TERESA LEIGH BOUCH,

AND DOES 1-50, inclusive;

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| 11 | and Michael Marrs |
| 10 | |
| 12 | LIMITED STATES DISTR |

ITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA

Case No.: 2:15-cv-01023-RFB-PAL

| vs. | STIPULATION AND ORDER TO EXTEND TIME TO FILE DISPOSITIVE MOTIONS AND RESPONSES AND |
|-------------------------------------|--|
| ELDORADO RESORTS CORPORATION, a | REPLIES THERETO |
| Florida corporation; MICHAEL MARRS; | KEI LIES THEKETO |
| BRUCE POLANSKY; KRISTEN BECK; | |
| DOMINIC TALEGHANI; JAMES GRIMES; | (SECOND REQUEST) |

Defendants.

Plaintiff,

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 second 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 December 28, 2016, Order to Extend Time 1

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To File Dispositive Motions and Responses and Replies Thereto (ECF No. 61), the current deadline for filing dispositive motions in this case is March 16, 2017, (see id. at 2). The parties have completed all discovery in this matter and good cause exists for the proposed extension based upon the following:

As the Court is aware, this case is one of thirty-three related lawsuits sitting before this Court. Recognizing the complexity of litigating these lawsuits simultaneously, the parties agreed to divide the cases into five groups and stagger deadlines in order to streamline the litigation process and avoid overlapping dispositive motion deadlines. Defendants filed Motions for Summary Judgment on September 1, 2016 and September 15, 2016, in Group II cases. Unfortunately, response and reply briefing had been delayed and was not completed until January 30, 2017. Although the parties continue to conduct discovery, it is apparent that the prior delays will make it difficult to comply with the current briefing schedule for the remaining matters. Accordingly, the parties hereby stipulate to adjust the briefing schedule in the manner presented below in an effort to allow the parties an aggressive, yet realistic approach to complete all pre-trial activity in the related actions.

Based upon the foregoing, the parties have agreed that the dispositive motion deadlines should be extended by seven (7) days in the following manner:

- Defendants shall file their dispositive motion no later than March 23, 2017;
- Plaintiff shall file any response to Defendants' dispositive motions no later than **April 24, 2017**;
- Defendants shall file their reply no later than May 24, 2017.

| | 1 | This stipulation is not brought for purposes of delay or any other improper purpose. | | | | | |
|-------------------------|---------------------------------|--|---|--|--|--|--|
| | 2 | Dated this 8 th day of February, 2017. | | | | | |
| | 3 | WATKINS & LETOFSKY, LLP | OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C. | | | | |
| TELEPHONE: /OZ.369.6800 | 4 5 6 7 8 9 | /s/ Daniel R. Watkins 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 | /s/ Jill Garcia 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 | | | | |
| | 11 12 | | <u>ORDER</u> | | | | |
| | 13 | IT IS SO ORDERED. | | | | | |
| | 1415 | | UNITED TATES MAGISTRATE JUDGE February 10, 2017 | | | | |
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