

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 ANTHONY L. MARTIN, ESQ.  
Nevada Bar No. 8177  
2 [anthony.martin@ogletreedeakins.com](mailto:anthony.martin@ogletreedeakins.com)  
3 JILL GARCIA, ESQ.  
Nevada Bar No. 7805  
4 [jill.garcia@ogletreedeakins.com](mailto:jill.garcia@ogletreedeakins.com)  
OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.  
5 Wells Fargo Tower  
Suite 1500  
6 3800 Howard Hughes Parkway  
Las Vegas, NV 89169  
7 Telephone: 702.369.6800  
8 Fax: 702.369.6888

9 Attorneys for Defendants Eldorado Resorts Corporation,  
and Michael Marrs

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

13 MARCELLA PARR,  
14 Plaintiff,  
15 vs.  
16 ELDORADO RESORTS CORPORATION, a  
17 Florida Corporation; MICHAEL MARRS;  
18 BRUCE POLANSKY; KRISTEN BECK;  
19 DOMINIC TALAGANI; JAMES GRIMES;  
and DOES 1-50, inclusive,  
20 Defendants.

Case No. 2:15-cv-01030-RFB-PAL

**STIPULATION AND ORDER TO  
EXTEND TIME TO FILE DISPOSITIVE  
MOTIONS AND RESPONSES AND  
REPLIES THERETO  
(THIRD REQUEST)**

21 Pursuant to LR IA 6-1, LR IA 6-2 and LR 26-4, Plaintiff Marcella Parr and Defendants  
22 Eldorado Resorts Corporation ("Eldorado") and Michael Marrs ("Marrs") (collectively  
23 "Defendants"), by and through their undersigned counsel, hereby stipulate and agree to this third  
24 request for extension of time for the parties to file a response and reply to the previously filed  
25 Dispositive Motion (ECF No. 53). Pursuant to the Stipulation and Order to Extend Time to File  
26 Dispositive Motions, and Responses thereto (Second Request) (ECF No. 52.), Defendants filed the  
27  
28

1 Dispositive Motion in this case on March 23, 2017 (ECF No. 53). The parties have completed all  
2 discovery in this matter, and good cause exists for the proposed extension based upon the  
3 following:

4 As the Court is aware, this case is one of over thirty 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. On February 9, 2017, the parties  
8 agreed to a comprehensive briefing schedule for dispositive motions in the remaining groups of  
9 cases. (ECF No. 52.) The current status of the comprehensive briefing schedule is as follows:

10 Group III(A)

- 11 • Defendants shall file dispositive motions by February 27, 2017.
- 12 • Plaintiffs shall file oppositions by March 29, 2017.
- 13 • Defendants shall file replies by April 28, 2017.

14 Group III(B)

- 15 • Defendants shall file dispositive motions by March 23, 2017.
- 16 • Plaintiffs shall file oppositions by April 24, 2017.
- 17 • Defendants shall file replies by May 24, 2017.

18 Group IV(A)

- 19 • Defendants shall file dispositive motions by April 13, 2017.
- 20 • Plaintiffs shall file oppositions by May 12, 2017.
- 21 • Defendants shall file replies by June 13, 2017.

22 Group IV(B)

- 23 • Defendants shall file dispositive motions by June 6, 2017.
- 24 • Plaintiffs shall file oppositions by July 6, 2017.

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

- Defendants shall file replies by August 7, 2017.

Group V

- Defendants shall file dispositive motions by June 22, 2017.
- Plaintiffs shall file oppositions by July 24, 2017.
- Defendants shall file replies by August 23, 2017.

In compliance with that stipulation, Defendants filed Motions for Summary Judgment on February 27, 2017, in Barnes v. Eldorado Resorts Corp., Case No.: 2:15-cv-01026-RFB-PAL (ECF No. 60); Kaplan v. Eldorado Resorts Corp., Case No.: 2:15-cv-01015-RFB-PAL (ECF No. 57); D. Parr v. Eldorado Resorts Corp., Case No.: 2:15-cv-01028-RFB-PAL (ECF No. 50); and Scheinberg v. Eldorado Resorts Corp., Case No.: 2:15-cv-01031-RFB-PAL (ECF No. 63). Unilaterally and without notice to defense counsel, on the day before oppositions were due, Plaintiffs filed a request for an extension to file oppositions to the Motions for Summary Judgment on March 28, 2017, in the foregoing cases: Barnes v. Eldorado Resorts Corp., Case No.: 2:15-cv-01026-RFB-PAL (ECF No. 63); Kaplan v. Eldorado Resorts Corp., Case No.: 2:15-cv-01015-RFB-PAL (ECF No. 60); D. Parr v. Eldorado Resorts Corp., Case No.: 2:15-cv-01028-RFB-PAL (ECF No. 53); and Scheinberg v. Eldorado Resorts Corp., Case No.: 2:15-cv-01031-RFB-PAL (ECF No. 66), seeking to extend the current filing date of March 29, 2017, to April 12, 2017. This request remains pending before the Court. Due to this delay, the entire comprehensive briefing schedule has been impacted, causing overlapping and unreasonable deadlines. The delays will make it difficult to comply with the current briefing schedules for the remaining matters.

...  
...  
...  
...

1 Accordingly, the parties hereby stipulate to adjust the briefing schedule in the manner  
2 presented below in an effort to allow the parties to comply with the briefing schedule in a  
3 reasonable manner as follows:

4 Group III(A)

- 5 • Plaintiffs shall file oppositions by April 12, 2017.
- 6 • Defendants shall file replies by May 12, 2017.

7 Group III(B)

- 8 • Plaintiffs shall file oppositions by May 8, 2017.
- 9 • Defendants shall file replies by June 7, 2017.

10 Group IV(A)

- 11 • Defendants shall file dispositive motions by May 31, 2017.
- 12 • Plaintiffs shall file oppositions by June 30, 2017.
- 13 • Defendants shall file replies by July 31, 2017.

14 Group IV(B)

- 15 • Defendants shall file dispositive motions by June 21, 2017.
- 16 • Plaintiffs shall file oppositions by July 21, 2017.
- 17 • Defendants shall file replies by August 21, 2017.

18 Group V

- 19 • Defendants shall file dispositive motions by August 30, 2017.
- 20 • Plaintiffs shall file oppositions by September 29, 2017.
- 21 • Defendants shall file replies by October 30, 2017.

22 As relevant to this matter, the parties have agreed that the dispositive motion deadlines  
23 should be extended as follows:  
24

25  
26  
27  
28 . . .

