

1 Elayna J. Youchah, Bar # 5837
 youchahe@jacksonlewis.com
 2 Phillip C. Thompson, Bar # 12114
 phillip.thompson@jacksonlewis.com
 3 **JACKSON LEWIS P.C.**
 3800 Howard Hughes Parkway, Suite 600
 4 Las Vegas, Nevada 89169
 Tel: (702) 921-2460
 5 Fax: (702) 921-2461

6 René E. Thorne, LA Bar No.22875
 Admitted Pro Hac Vice
 7 thorner@jacksonlewis.com
JACKSON LEWIS P.C.
 8 650 Poydras Street, Suite 1900
 New Orleans, Louisiana 70130
 9 Tel: (504) 208-1755
 Fax: (504) 208-1759

10 Attorneys for Plaintiffs *Landry's Inc.*,
 11 Claim Jumper Acquisition Company, LLC
 12 And Bubba Gump Shrimp Co. Restaurants, Inc.

13 **UNITED STATES DISTRICT COURT**
 14 **DISTRICT OF NEVADA**

15 LANDRY'S, INC., a Delaware corporation;
 16 CLAIM JUMPER ACQUISITION
 COMPANY, LLC, a Nevada limited liability
 17 company; BUBBA GUMP SHRIMP CO.
 RESTAURANTS, INC., a Delaware
 18 corporation,

19 Plaintiffs,

20 v.

21 BRIAN SANDOVAL, in his official capacity as
 Governor of the State of Nevada; SHANNON
 22 CHAMBERS, in her official capacity as Labor
 Commissioner of the State of Nevada, AMY L.
 23 PARKS, in her official capacity as Acting
 Insurance Commissioner of the State of Nevada,

24 Defendants.

Case No. 2:15-cv-01160-GMN-PAL

**STIPULATION AND ORDER TO
 EXTEND TIME FOR PLAINTIFFS
 TO FILE THEIR OPPOSITION TO
 INTERVENOR NEVADA STATE
 FEDERATION OF LABOR, AFL-
 CIO'S MOTION TO DISMISS
 SECOND AMENDED COMPLAINT**

(First Request)

25 Plaintiffs Landry's, Inc., Bubba Gump Restaurants, Inc., and Claim Jumper Acquisition
 26 Company, LLC (collectively, "Plaintiffs"), by and through their counsel of record, Jackson Lewis
 27 P.C., and Intervenor Nevada State Federation of Labor, AFL-CIO ("Intervenor"), by and through
 28

1 its counsel of record, McCracken , Stemerman & Holsberry, hereby stipulate and agree to extend
2 the time for the Plaintiffs to file their opposition to Intervenor's Motion to Dismiss Second
3 Amended Complaint ("Motion to Dismiss").

4 This extension is necessary because the Motion to Dismiss raises numerous questions of
5 federal and state statutory and constitutional law. The nature of the claims and parties in this case
6 and the subjects underlying the Motion to Dismiss are such that Plaintiffs require substantially more
7 time to brief them than a typical motion under Fed. R. Civ. P. 12(b)(6).

8 Accordingly, the parties stipulate and agree that Plaintiffs shall have a brief, two-week
9 extension through and including September 20, 2016, to file their Opposition to the Motion to
10 Dismiss.

11 This stipulation and order is sought in good faith and not for the purpose of delay. No prior
12 request for any extension of time has been made.

13 Dated this 19th day of August, 2016.

14 McCracken, STEMERMAN &
15 HOLSBERY

JACKSON LEWIS P.C.

16 /s/ Richard McCracken
17 Richard McCracken, Bar # 2748
18 1630 S. Commerce Street, Suite A-1
19 Las Vegas, Nevada 89102

/s/ Phillip C. Thompson
Elayna J. Youchah, Bar # 5837
Phillip C. Thompson, Bar # 12114
3800 Howard Hughes Parkway, Ste. 600
Las Vegas, Nevada 89169
Attorneys for Plaintiffs

20 Attorneys for Intervenor
21 Nevada State Federation of Labor, AFL-CIO

ORDER

22 IT IS SO ORDERED.
23 DATED this 24 day of August, 2016.

24 
25 _____
26 U.S. District Judge