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11 Michael Marrs, Kristen Beck and Dominic Taleghani

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

14 DANIEL PRUSSAK,
15
16 Plaintiff,
17 vs.
18 ELDORADO RESORTS CORPORATION, a
19 Florida Corporation; MICHAEL MARRS;
20 KRISTEN BECK; DOMINIC TALEGHANI;
21 AND DOES 1-50, inclusive,
22
23 Defendants.

Case No.: 2:15-cv-01496-RFB-PAL
ORDER
**DEFENDANTS' STATEMENT OF NON-
OPPOSITION TO PLAINTIFF'S
REQUEST FOR AN EXTENSION TO
FILE AN OPPOSITION TO THE
MOTION FOR SUMMARY
JUDGMENT**

22 Defendant Eldorado Resorts Corporation ("Eldorado") and Individual Defendants Michael
23 Marrs ("Marrs"), Kristen Beck ("Beck") and Dominic Taleghani ("Taleghani") (the "Individual
24 Defendants") (collectively "Defendants"), respectfully submit this Statement of Non-Opposition to
25 Plaintiff's Request for an Extension to File an Opposition to the Motion for Summary Judgment in
26 order to address Plaintiff's Counsel's failure to comply with the Federal Rules of Civil Procedure.
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1 In compliance with the current Scheduling Order, Defendants’ filed three Motions for
2 Summary Judgment on June 6, 2017.¹ Despite the Scheduling Order setting out the time frame for
3 all dispositive motion deadlines in the Related Actions², Plaintiff’s Counsel has sought an
4 extension on almost every response date and continues to unilaterally seek extensions from the
5 Court.
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7 Defendants do not oppose Plaintiff’s request, provided: (1) Plaintiff complies with his
8 requested deadline of August 11, 2017, and no further extensions are requested; (2) Defendants
9 have thirty (30) days from the date the responses are filed to prepare replies; and (3) the deadlines

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17 ¹ In addition to this matter, Motions for Summary Judgment were also filed in Iannazo v. Eldorado Resorts
18 Corporation, et al., Case No. 2:15-cv-01497-RFB-PAL; and Cardinale v. Eldorado Resorts Corporation, et
19 al., Case No. 2:15-cv-01492-RFB-PAL.

20 ² Arora v. Eldorado Resorts Corporation, et al., Case No.: 2:15-cv-00751-RFB-PAL; Azizi v. Eldorado
21 Resorts Corporation, et al., Case No.: 2:15-cv-00755-RFB-PAL; Baccala v. Eldorado Resorts Corporation,
22 et al., Case No.: 2:15-cv-00752-RFB-PAL; Moser v. Eldorado Resorts Corporation, et al., Case No.: 2:15-
23 cv-00757-RFB-PAL; Saak v. Eldorado Resorts Corporation, et al., Case No.: 2:15-cv-00754-RFB-PAL;
24 Wells v. Eldorado Resorts Corporation, et al., Case No.: 2:15-cv-01006-RFB-PAL; Barnes v. Eldorado
25 Resorts Corp., Case No. 2:15-cv-01026-RFB-PAL; Bouch v. Eldorado Resorts Corp., Case No. 2:15-cv-
26 01023-RFB-PAL; Olshansky v. Eldorado Resorts Corporation, et al., Case No.: 2:15-cv-01017-RFB-PAL;
27 Parr, D. v. Eldorado Resorts Corporation, et al., Case No.: 2:15-cv-01028-RFB-PAL; Parr, M. v. Eldorado
28 Resorts Corporation, et al., Case No.: 2:15-cv-01030-RFB-PAL; Scheinberg v. Eldorado Resorts
Corporation, et al., Case No.: 2:15-cv-01031-RFB-PAL; Sekkat v. Eldorado Resorts Corporation, et al.,
Case No.: 2:15-cv-01029-RFB-PAL; Cardinale v. Eldorado Resorts Corporation, et al., Case No. 2:15-cv-
01492-RFB-PAL; Iannazzo v. Eldorado Resorts Corporation, et al., Case No. 2:15-cv-01497-RFB-PAL;
Newman v. Eldorado Resorts Corporation, et al., Case No.: 2:15-cv-01486-RFB-PAL; Bagsby v. Eldorado
Resorts Corporation, et al., Case No. 2:15-cv-02330-RFB-PAL; Browne v. Eldorado Resorts Corporation
et al., Case No. 2:15-cv-02328-RFB-PAL; Eldor v. Eldorado Resorts Corporation, et al., Case No. 2:15-cv-
02331-RFB-PAL; and Heckendorn v. Eldorado Resorts Corporation, et al., Case No. 2:15-cv-02332-RFB-
PAL.

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for filing dispositive motions in the Group V Related Cases which are currently scheduled to be filed on September 29, 2017, are extended by approximately two weeks to October 16, 2017.

DATED this 9th day of August, 2017.

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

/s/ Jill Garcia
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Attorneys for Defendants Eldorado Resorts Corporation, Michael Marrs, Kristen Beck and Dominic Taleghani

IT IS SO ORDERED:



RICHARD F. BOULWARE, II
United States District Judge

DATED this 29th day of August, 2017.

CERTIFICATE OF SERVICE

I hereby certify that I electronically transmitted the foregoing **DEFENDANTS' STATEMENT OF NON-OPPOSITION TO PLAINTIFF'S REQUEST FOR AN EXTENSION TO FILE AN OPPOSITION TO THE MOTION FOR SUMMARY JUDGMENT** to the Clerk's Office using the CM/ECF system for filing and transmittal of a notice of electronic filing to the following CM/ECF registrants:

Daniel R. Watkins, Esq.
Brian S. Letofsky, Esq.

Pursuant to Federal Rule of Civil Procedure 5(b), I hereby further certify that service of the foregoing **DEFENDANTS' STATEMENT OF NON-OPPOSITION TO PLAINTIFF'S REQUEST FOR AN EXTENSION TO FILE AN OPPOSITION TO THE MOTION FOR SUMMARY JUDGMENT** was also made this day by depositing a true and correct copy of same for mailing, first class mail, postage prepaid thereon, at Las Vegas, Nevada, addressed to the following:

Daniel R. Watkins, Esq.
Brian S. Letofsky, Esq.
Watkins & Letofsky, LLP
8215 S. Eastern Avenue, Suite 265
Las Vegas, NV 89123
Attorneys for Plaintiff Daniel Prussak

DATED this 9th day of August, 2017.

/s/ Darhyl Kerr
An Employee of Ogletree, Deakins, Nash,
Smoak & Stewart, P.C.