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9 Attorneys for Defendants Eldorado Resorts Corp.,
10 Michael Marrs, Kristen Beck, Dominic Taleghani

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

13 HANIT HAREL,
14
15 Plaintiff,

16 vs.

17 ELDORADO RESORTS CORPORATION, a
18 Florida Corporation; MICHAEL MARRS;
19 KRISTEN BECK; DOMINIC TALEGHANI;
20 AND DOES 1-50, inclusive,
21
22 Defendants.

Case No.: 2:15-cv-01497-RFB-PAL

**DEFENDANTS' STATEMENT OF NON-
OPPOSITION TO PLAINTIFF'S
REQUEST FOR AN EXTENSION TO
FILE AN OPPOSITION TO THE
MOTION FOR SUMMARY
JUDGMENT**

23 Defendant Eldorado Resorts Corporation ("Eldorado") and Individual Defendants Michael
24 Marrs ("Marrs"), Kristen Beck ("Beck") and Dominic Taleghani ("Taleghani") (the "Individual
25 Defendants") (collectively, the "Defendants"), respectfully submit this Statement of Non-
26 Opposition to Plaintiff's Request for an Extension to File An Opposition to the Motion for
27 Summary Judgment in order to address Plaintiff's Counsel's failure to comply with the Federal
28 Rules of Civil Procedure.

1 In compliance with the current Scheduling Order, Defendants' filed four Motions for
2 Summary Judgment on May 31, 2017.¹ Despite the Scheduling Order setting out the time frame
3 for all dispositive motion deadlines in the Related Actions², Plaintiff has sought an extension on
4 almost every response date and continues to unilaterally seek extensions from the Court, without
5 regard to the procedural meet and confer rules and filing deadlines contained in the Local Rules
6 and/or the overall impact on the remaining dispositive motion deadlines. These repeated requests
7 continue to delay these matters.
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9 Defendants do not oppose Plaintiff's request, provided: (1) Plaintiff complies with her
10 requested deadline of July 14, 2017, and no further extensions are requested; (2) Defendants have
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15 ¹ In addition to this matter, Motions for Summary Judgment were also filed in *Coury v. Eldorado Resorts*
16 *Corporation, et al.*, Case No.: 2:15-cv-01488-RFB-PAL; *Newman v. Eldorado Resorts Corporation, et al.*,
17 *Case No. 2:15-cv-01486-RFB-PAL*; and *Santovito v. Eldorado Resorts Corporation, et al.*, Case No. 2:15-
18 *cv-01032-RFB-PAL*.

19 ² *Arora v. Eldorado Resorts Corporation, et al.*, Case No.: 2:15-cv-00751-RFB-PAL; *Azizi v.*
20 *Eldorado Resorts Corporation, et al.*, Case No.: 2:15-cv-00755-RFB-PAL; *Baccala v. Eldorado*
21 *Resorts Corporation, et al.*, Case No.: 2:15-cv-00752-RFB-PAL; *Moser v. Eldorado Resorts*
22 *Corporation, et al.*, Case No.: 2:15-cv-00757-RFB-PAL; *Saak v. Eldorado Resorts Corporation, et*
23 *al.*, Case No.: 2:15-cv-00754-RFB-PAL; *Wells v. Eldorado Resorts Corporation, et al.*, Case No.:
24 *2:15-cv-01006-RFB-PAL*; *Barnes v. Eldorado Resorts Corp.*, Case No. 2:15-cv-01026-RFB-PAL;
25 *Bouch v. Eldorado Resorts Corp.*, Case No. 2:15-cv-01023-RFB-PAL; *Olshansky v. Eldorado*
26 *Resorts Corporation, et al.*, Case No.: 2:15-cv-01017-RFB-PAL; *Parr, D. v. Eldorado Resorts*
27 *Corporation, et al.*, Case No.: 2:15-cv-01028-RFB-PAL; *Parr, M. v. Eldorado Resorts*
28 *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; *Prussak v. Eldorado Resorts Corporation, et al.*, Case No. 2:15-cv-
01414-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.

1 thirty (30) days from the date the responses are filed to prepare replies; and (3) the deadlines for
2 filing dispositive motions in the Group V Related Cases which are currently scheduled to be filed
3 on August 30, 2017, are extended by thirty (30) days to September 29, 2017.

4 Dated this 6th day of July, 2017.

5
6 OGLETREE, DEAKINS, NASH, SMOAK & STEWART,
P.C.

7
8 /s/ Jill Garcia

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Jill Garcia

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Attorneys for Defendants Eldorado Resorts Corp.,

Michael Marrs, Kristen Beck, and Dominic Taleghani

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16 IT IS SO ORDERED:

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19 RICHARD F. BOULWARE, II

20 United States District Judge

21 DATED this 11th day of July, 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 South Eastern Avenue
Suite 265
Las Vegas, NV 89123

Attorneys for Plaintiff Hanit Harel

DATED this 6th day of July, 2017.

/s/ Darhyl Kerr

An Employee Of Ogletree, Deakins, Nash,
Smoak & Stewart, P.C.