

CHRISTIANSEN LAW OFFICES
810 S. Casino Center Blvd., Suite 104
Las Vegas, Nevada 89101
702-240-7979 • Fax 866-412-6992

1 PETER S. CHRISTIANSEN, ESQ.
Nevada Bar No. 5254
2 pete@christiansenlaw.com
R. TODD TERRY, ESQ.
3 Nevada Bar No. 6519
4 tterry@christiansenlaw.com
KEELY A. PERDUE, ESQ.
5 Nevada Bar No. 13931
6 keely@christiansenlaw.com
CHRISTIANSEN LAW OFFICES
7 810 S. Casino Center Blvd., Suite 104
Las Vegas, Nevada 89101
8 Tel: (702) 240-7979
9 Fax: (866) 412-6992
Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

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12 KEVIN BROWN, an individual; JENNIFER
13 BROWN, an individual;
14 Plaintiffs,
15 v.
16 SAM’S WEST, INC.; ADVANTAGE
17 SALES AND MARKETING, LLC and
DOES 1 through 100;
18 Defendants.

Case No. 2:15-cv-01964-LDG-CWH

**STIPULATION AND [PROPOSED]
ORDER EXTENDING TIME FOR
PLAINTIFFS TO FILE OPPOSITION TO
DEFENDANT SAM’S WEST, INC.’S
MOTION TO EXCLUDE PLAINTIFFS’
EVIDENCE AND DAMAGES RELATED
TO PLAINTIFF JENNIFER BROWN’S
CLAIM OF LOSS OF CONSORTIUM
PURSUANT TO FRCP 37 AND ANY
JOINDERS THERETO**

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21 Pursuant to Local Rules IA 6-1, 6-2, and LR 7-1, the undersigned counsel of record for
22 Plaintiffs, Kevin Brown and Jennifer Brown, Defendant, Sam’s West, Inc., and Defendant,
23 Advantage Sales & Marketing, LLC, hereby STIPULATE to extend the time for Plaintiffs to
24 file an Opposition to Defendant Sam’s West, Inc.’s Motion to Exclude Plaintiffs’ Evidence and
25 Damages Related to Plaintiff Jennifer Brown’s Claim of Loss of Consortium (ECF No. 82) (the
26 “Motion”) and any joinders thereto. Defendant Sam’s West, Inc. filed its Motion on November
27 14, 2017. Defendant Advantage Sales & Marketing, LLC filed a Joinder to the Motion on
28 November 15, 2017. (ECF No. 83). Plaintiffs’ Opposition is currently due on November 28,

1 2017. If approved, the foregoing parties have agreed to a one-day extension to file the
2 Opposition, which would make it due on November 29, 2017. This is the first stipulation
3 seeking to extend the Opposition deadline.

4 Plaintiffs submits that good cause exists to approve the requested stipulation as the
5 requested one-day extension will provide Plaintiffs with sufficient time to address the
6 arguments raised by Defendant Sam's West, Inc. in the Motion.

7 DATED this 27th day of November, 2017.

DATED this 28th day of November, 2017.

8 CHRISTIANSEN LAW OFFICES

PHILLIPS, SPALLAS & ANGSTADT, LLC

9 /s/ Keely A. Perdue, Esq.

/s/ Pooja Kumar, Esq.

10 By _____

By _____

11 PETER S. CHRISTIANSEN, ESQ.

ROBERT K. PHILLIPS, ESQ.

12 R. TODD TERRY, ESQ.

Nevada Bar No. 11441

13 KEELY A. PERDUE, ESQ.

POOJA KUMAR, ESQ.

14 *Attorneys for Plaintiffs*

Nevada Bar No. 12988

15 502 South Ninth Street

Las Vegas, NV 89101

Attorneys for Defendant Sam's West, Inc.

16 DATED this 27th day of November, 2017.

17 MURCHISON & CUMMING, LLP

18 /s/ Michael J. Nunez, Esq.

19 By _____

MICHAEL J. NUNEZ, ESQ.

20 Nevada Bar No. 10703

21 BRYAN J. URE, ESQ.

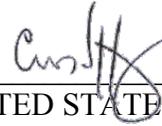
Nevada Bar No. 11004

22 350 South Rampart Blvd., Suite 320

Las Vegas, NV 89145

*Attorneys for Defendant Advantage Sales &
Marketing, LLC*

25 **IT IS SO ORDERED.**

26 By  _____
UNITED STATES MAGISTRATE JUDGE

27 Dated: November 29, 2017
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CERTIFICATE OF SERVICE

Pursuant to Federal Rule of Civil Procedure 5 and the Court’s Local Rules, the undersigned hereby certifies that on this 28th day of November, 2017, a copy of the foregoing document entitled **STIPULATION AND [PROPOSED] ORDER EXTENDING TIME FOR PLAINTIFFS TO FILE OPPOSITION TO DEFENDANT SAM’S WEST, INC.’S MOTION TO EXCLUDE PLAINTIFFS’ EVIDENCE AND DAMAGES RELATED TO PLAINTIFF JENNIFER BROWN’S CLAIM OF LOSS OF CONSORTIUM PURSUANT TO FRCP 37 AND ANY JOINDERS THERETO** was filed and served through the Court’s electronic filing system (CM/ECF) upon all registered parties and their counsel.



An employee of Christiansen Law Offices