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 7 Attorneys for Defendant  
 8 *Sam's West, Inc.*

9 UNITED STATES DISTRICT COURT  
 10 DISTRICT OF NEVADA

11 KEVIN BROWN, an individual,  
 12 Plaintiff,  
 13 v.  
 14 SAM'S WEST, INC.; ADVANTAGE SALES  
 AND MARKETING, LLC; and DOES 1  
 15 through 100;  
 16 Defendants.

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

**STIPULATION AND [PROPOSED]  
 ORDER TO EXTEND THE DATE TO  
 FILE PRE-TRIAL ORDER [FIRST  
 REQUEST]**

17  
 18 WHEREAS, pursuant to the order of this Court (Doc. #93), the parties were to file a Joint Pretrial  
 19 Order on or before April 20, 2018; and

20 WHEREAS, on February 12, 2018, the Court ordered that Defendant Sam's West can conduct  
 21 limited discovery as to the loss of consortium claim brought by Plaintiff Jennifer Brown in the matter  
 22 including re-deposing Jennifer Brown on the loss of consortium claim and disclosing an expert  
 23 witness, if necessary, and the parties wish to utilize this information in preparation of the Joint  
 24 Pretrial Order;

25 WHEREAS, the parties are currently engaging in settlement negotiations to resolve this matter in  
 26 its entirety. Given these discussions, and in order to avoid potentially unnecessary additional fees  
 27 and costs if this matter settles, the parties stipulate to extend the deadline for the Joint Pre-Trial  
 28 Order.

1 IT IS HEREBY STIPULATED AND AGREED by and between Betsy C. Jefferis, Esq. of the law  
2 firm of PHILLIPS, SPALLAS & ANGSTADT LLC, Attorneys for Defendant Sam's West, Inc. and  
3 R. Todd Terry, Esq. and Keely A. Purdue, Esq. of CHRISTIANSEN LAW OFFICES, Attorneys for  
4 Plaintiffs Kevin and Jennifer Brown, as follows:

5 That the deadline for filing the Joint Pretrial Order be extended to June 19, 2018.

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7 Respectfully submitted on this 11th day of April, 2018, by:

8 **CHRISTIANSEN LAW OFFICES**  
9 /s/ **Keely A Purdue**

10 \_\_\_\_\_  
11 KEELY A. PURDUE, ESQ.  
12 Nevada Bar No. 13931  
801 S. Casino Center Blvd.  
Las Vegas, NV 89101  
(702)-240-7979

13 Attorneys for Plaintiff  
14 Kevin Brown

**PHILLIPS, SPALLAS & ANGSTADT, LLC**  
/s/ **Betsy C. Jefferis**

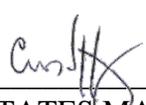
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BETSY C. JEFFERIS, ESQ.  
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504 South Ninth Street  
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(702) 938-1510

Attorneys for Defendant  
*Sam's West, Inc*

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16 **IT IS SO ORDERED.**

17 Dated this 12th day of April, 2018.

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20 \_\_\_\_\_  
21 UNITED STATES MAGISTRATE JUDGE  
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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on the 11<sup>th</sup> day of April, 2018, I served a true and correct copy of the  
3 foregoing, **STIPULATION AND [PROPOSED] ORDER TO EXTEND THE DATE TO FILE**  
4 **PRE-TRIAL ORDER [FIRST REQUEST]**, by facsimile and by U.S. Mail, in a sealed envelope,  
5 first-class postage fully prepaid, addressed to the following counsel of record, at the address listed  
6 below:  
7

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ATTORNEY OF RECORD	TELEPHONE/FAX	PARTY
PETER S. CHRISTIANSEN, ESQ. Nevada Bar No. 5254 CHRISTIANSEN LAW OFFICES 801 S. Casino Center Blvd. Las Vegas, Nevada 89101	Phone 702-240-7979 Fax 866-412-6992	Plaintiff

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12 /s/ Betsy C. Jefferis

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14 An Employee of PHILLIPS, SPALLAS & ANGSTADT LLC  
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