

1 JEFFREY S. RUGG, ESQ.  
 Nevada Bar No. 10978  
 2 Brownstein Hyatt Farber Schreck, LLP  
 100 North City Parkway, Suite 1600  
 3 Las Vegas, Nevada 89106-4614  
 Telephone: (702) 382-2101  
 4 Fax: (702) 382-8135  
 Email: jrugg@bhfs.com  
 5  
 6 Attorneys for Defendant Volkswagen Group of  
 America, Inc.

7  
 8 **UNITED STATES DISTRICT COURT**  
 9 **DISTRICT OF NEVADA**

10  
 11 ADAM SCHWARTZ, individually and on  
 behalf of all others similarly situated,  
 12  
 Plaintiff,  
 13  
 v.  
 14  
 15 VOLKSWAGEN GROUP OF AMERICA,  
 INC., A New Jersey Corporation,  
 16  
 Defendant.

CASE NO.: 2:15-cv-1980-JCM-VCF

**STIPULATION AND ORDER**

17  
 18 Pursuant to Local Rule 7-1, Defendant Volkswagen Group of America, Inc. ("VWGoA"),  
 19 through its counsel, Brownstein Hyatt Farber Schreck, LLP, and Plaintiff Adam Schwartz  
 20 ("Plaintiff") by and through his counsel, Lynch, Hopper, Salzano & Smith, LLP, and hereby  
 21 stipulate as follows:

- 22 1. This action was commenced by the filing of a complaint on October 13, 2015.
- 23 2. The time to respond has not expired.
- 24 3. Plaintiff has informed VWGoA that he intends to file an amended complaint and  
 25 that it is not necessary for VWGoA to respond to the current complaint.

**BROWNSTEIN HYATT FARBER SCHRECK, LLP**  
 100 North City Parkway, Suite 1600  
 Las Vegas, NV 89106-4614  
 702.382.2101

1 WHEREFORE, the parties hereby stipulate and respectfully request that the Court enter  
2 an Order extending the time for VWGoA to answer or otherwise respond to the Complaint to  
3 permit Plaintiff time to file an Amended Complaint.

4  
5 Dated: November 9, 2015

Dated: November 9, 2015

6 /s/ Jeffrey S. Rugg  
7 JEFFREY S. RUGG, ESQ.  
8 Nevada Bar No. 10978  
9 Brownstein Hyatt Farber Schreck, LLP  
10 100 North City Parkway, Suite 1600  
11 Las Vegas, Nevada 89106-4614

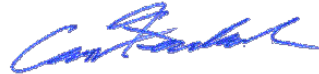
/s/ Charles "Dee" Hopper  
Charles "Dee" Hopper, Esq. (NV Bar No. 6346)  
Sergio Salzano, Esq. (NV Bar No. 6482)  
LYNCH, HOPPER, SALZANO & SMITH,  
LLP  
1640 Alta Drive, Ste. 11  
Las Vegas NV 89106

Attorneys for Defendant Volkswagen Group  
of America, Inc., A New Jersey Corporation

Attorneys for Plaintiff

**ORDER**

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

CASE NO.: 2:15-cv-01980-JCM-VCF

November 9, 2015

DATE: \_\_\_\_\_

Submitted by:

IT IS FURTHER ORDERED that the  
Amended Complaint must be filed  
by November 23, 2015.

/s/ Jeffrey S. Rugg  
JEFFREY S. RUGG, ESQ.  
Nevada Bar No. 10978  
Brownstein Hyatt Farber Schreck, LLP  
100 North City Parkway, Suite 1600  
Las Vegas, Nevada 89106-4614  
Telephone: (702) 382-2101  
Fax: (702) 382-8135  
Email: jrugg@bhfs.com

Attorneys for Defendant Volkswagen Group of America, Inc.