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4 *Attorneys for Defendant,*  
 5 *CONSUMER OPINION LLC*

6 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

7 **ABBEY DENTAL CENTER, INC., a Nevada**  
 8 **Corporation,**

9 **Plaintiff,**

10 vs.

11 **CONSUMER OPINION LLC, a Nevada**  
**Limited liability company; DOES 1-10; and**  
 12 **ROE ENTITIES 1-10, inclusive,**

13 **Defendant(s).**

Case No. 2:15-cv-02069-GMN-PAL

**STIPULATION AND (PROPOSED)**  
**ORDER TO STAY PROCEEDINGS**  
**(8th Request)**

14 Plaintiff, ABBEY DENTAL CENTER, INC., and Defendant, CONSUMER OPINION  
 15 LLC, by and through their respective, undersigned counsel, do hereby stipulate and agree as  
 16 follows:

17 1. The aforesaid parties are currently actively engaged in settlement negotiations in  
 18 regards to the instant matter.

19 2. On January 6, 2016, the parties stipulated to stay the proceedings in this matter  
 for thirty (30) days, in order to allow the parties to facilitate settlement.

20 3. The Court entered the parties' stipulation as an Order on January 14, 2016.  
 21 [ECF No. 7]

22 4. The Court's Order was due to expire on February 5, 2016.

23 5. Due to continuing settlement discussion, the parties stipulated to stay the matter  
 for a second time on February 3, 2016.

1           6.     The Court entered the parties' second stipulation as an Order on February 9,  
2 2016. [ECF No. 9]

3           7.     Due to continuing settlement discussion, the parties stipulated to stay the matter  
4 for a third time on March 3, 2016.

5           8.     The Court entered the parties' third stipulation as an Order on April 7, 2016.  
6 [ECF No. 12]

7           9.     Due to continuing settlement discussion, the parties stipulated to stay the matter  
8 for a fourth time on April 7, 2016.

9           10.    The Court entered the parties' fourth stipulation as an Order on April 20, 2016.  
10 [ECF No. 14]

11          11.    Due to continuing settlement discussion, the parties stipulated to stay the matter  
12 for a fifth time on May 10, 2016.

13          12.    The Court entered the parties' fifth stipulation as an Order on May 16, 2016.  
14 [ECF No. 16]

15          13.    Due to continuing settlement discussion, the parties stipulated to stay the matter  
16 for a sixth time on June 9, 2016.

17          14.    The Court entered the parties' sixth stipulation as an Order on June 16, 2016.  
18 [ECF No. 18].

19          15.    Due to continuing settlement discussion, the parties stipulated to stay the matter  
20 for a seventh time on August 9, 2016.

21          16.    The Court entered the parties' seventh stipulation as an Order on August 12,  
22 2016. [ECF No. 20].

23          17.    The parties continue to engage in productive settlement discussion. As part of  
their ongoing discussion, the parties have been negotiating language to be included in the  
parties' settlement agreement. Coming to an agreement on the appropriate language for  
inclusion has caused delays in the parties' negotiation efforts, as the conclusion will impact

1 future litigation. Accordingly, in order to facilitate those efforts, as well as to minimize  
2 attorneys' fees and other legal expenses, the parties believe that the present civil action should  
3 be stayed for an additional sixty (60) days.

4 18. Therefore, the parties agree that the Court may enter the following Order and  
5 request that the Court do so accordingly:

6 a. Except as otherwise provided below, this action shall be stayed for a  
7 period of sixty (60) days from the date this stipulation is filed with the Court.

8 b. The stay shall immediately terminate upon Plaintiff's filing with the  
9 Court, and serving upon Defendant, a notice that Defendant must file an answer to Plaintiff's  
10 complaint in this action or otherwise respond to same in accordance with the *Federal Rules of*  
*Civil Procedure* and by no later than twenty-one (21) days after service of the notice.

11 c. The parties stipulate that nothing in this delay shall be deemed to prejudice  
12 Defendant's right to file an Anti-SLAPP motion, under NRS 41.635 *et. seq.*

13 **SO STIPULATED AND AGREED** on this 11th day of October, 2016.

14 **THE AMIN LAW GROUP NV, LTD.**

**RANDAZZA LEGAL GROUP, PLLC**

15 /s/ Ismail Amin

/s/ Marc J. Randazza

16 ISMAIL AMIN, ESQ.

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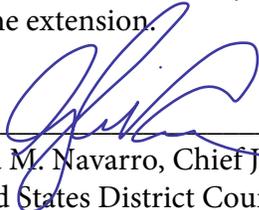
19 *Attorney for Plaintiff*

*Attorney for Defendant*

20 **IT IS SO ORDERED.**

21 **IT IS FURTHER ORDERED** that no further stipulations to extend the stay will be granted  
22 without a hearing to demonstrate a sufficient basis for the extension.

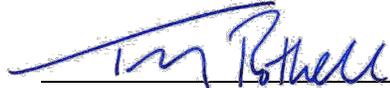
**DATED** this 17 day of October, 2016.

23   
Gloria M. Navarro, Chief Judge  
United States District Court

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on October 11, 2016, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I further certify that a true and correct copy of the foregoing document being served via transmission of Notices of Electronic Filing generated by CM/ECF.

Respectfully Submitted,



Employee,  
Randazza Legal Group, PLLC

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