

1 Marc J. Randazza (NV Bar No. 12265)
 2 Alex J. Shepard (NV Bar No. 13582)
 3 RANDAZZA LEGAL GROUP, PLLC
 4035 S. El Capitan Way
 3 Las Vegas, NV 89147
 Telephone: 702-420-2001
 4 Facsimile: 305-437-7662
 ecf@randazza.com

5 *Attorneys for Defendant,*
 6 *Consumer Opinion LLC*

7 Ismail Amin, Esq. (NV Bar No. 9343)
 Lawrence Kulp, Esq. (NV Bar No. 7411)
 Breane Stryker, Esq. (NV Bar No. 13594)
 8 THE AMIN LAW GROUP, NV., LTD.
 3753 Howard Hughes Parkway, Suite 200
 9 Las Vegas, Nevada 89169
 Telephone: (702) 990-3583
 10 Facsimile: (702) 441-2488

11 *Attorneys for Plaintiff,*
 12 *Abbey Dental Center, Inc.*

13 **UNITED STATES DISTRICT COURT**
 14 **DISTRICT OF NEVADA**

14 ABBEY DENTAL CENTER, INC.,
 a Nevada Corporation,

15 Plaintiff,

16 v.

17 CONSUMER OPINION LLC, a Nevada
 18 Limited liability company; DOES 1-10; and
 ROE ENTITIES 1-10, inclusive,

19 Defendants.

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

STIPULATION AND (PROPOSED)
ORDER TO EXTEND TIME FOR
PLAINTIFF TO RESPOND TO
DEFENDANT’S SECOND SPECIAL
MOTION TO DISMISS FIRST AMENDED
COMPLAINT PURSUANT TO NRS 41.660
AND MOTION FOR SUMMARY
JUDGMENT

(First Request)

20
 21 As further detailed hereinafter, Defendant CONSUMER OPINION LLC (“Defendant
 22 Consumer Opinion”) filed a Second Special Motion to Dismiss Plaintiff ABBEY DENTAL
 23 CENTER, INC. (“Plaintiff Abbey Dental”)’s First Amended Complaint (ECF No. 28) in this
 24 matter on or about December 9, 2016. (ECF Nos. 30, 31). The Parties, by and through their
 25 respective, undersigned counsel, do hereby stipulate and agree as follows:

26 1. On October 27, 2015, Plaintiff Abbey Dental filed its Complaint against Defendant
 27 Consumer Opinion. (ECF No. 1).

1 2. On January 6, 2016, Defendant Consumer Opinion informed Plaintiff Abbey
2 Dental that it would be seeking a dismissal via an Anti-SLAPP motion in this case. (ECF No.
3 31-2).

4 3. After eight stipulations to extend time, Defendant Consumer Opinion filed its
5 Special Motion to Dismiss Pursuant to NRS 41.660 and Motion for Summary Judgment on
6 December 7, 2016. (ECF Nos. 25 & 27).

7 4. Plaintiff Abbey Dental responded to Defendant's Motion the next day by filing its
8 First Amended Complaint. (ECF No. 28).

9 5. On December 9, 2016, Defendant Consumer Opinion responded to Plaintiff's First
10 Amended Complaint by filing its Second Special Motion to Dismiss Pursuant to NRS 41.660 and
11 Motion for Summary Judgment. (ECF Nos. 30 & 31).

12 6. Since Defendant's Second Anti-SLAPP Motion was filed, the Parties have been in
13 cordial discussions regarding possible discovery that the Plaintiff may wish for prior to responding
14 to the pending Anti-SLAPP Motion.

15 7. The Parties are desirous of relieving the Court of the necessity of contemplating
16 their rights under NRS 41.660(4) or Fed. R. Civ. P. 56(d), and believe that they can resolve the
17 issue informally.

18 8. However, in order to do so, Plaintiff Abbey Dental wishes to provide Defendant
19 Consumer Opinion with its proposed discovery requests. Upon receiving them, the Parties will
20 meet and confer as to the propriety of the requests.

21 9. Plaintiff Abbey Dental requires approximately one week in which to produce the
22 discovery requests to Defendant Consumer Opinion, and the Parties expect to spend a few days
23 meeting and conferring on the limitation of the requests.

24 10. Accordingly, the Parties jointly stipulate to an extension of the current response
25 date to the Anti-SLAPP Motion by 30 days; Plaintiff Abbey Dental's deadline to respond to
26 Defendant Consumer Opinion's Second Special Motion to Dismiss Pursuant to NRS 41.660 and
27

1 Motion for Summary Judgment (ECF Nos. 30 & 31) is extended from December 30, 2016 to
2 January 29, 2017.

3 11. The Parties also stipulate that there is good cause for Plaintiff, Abbey Dental, to
4 seek discovery from third parties immediately.

5 12. This is the first stipulation for an extension of time for Plaintiff Abbey Dental to
6 respond to Defendant Consumer Opinon's Second Special Motion to Dismiss Pursuant to NRS
7 41.660 and Motion for Summary Judgment (ECF Nos. 30 & 31).

8 13. This extension will either permit the Parties to solve any discovery issues on their
9 own, without the need for Court intervention, or it will allow the Parties to significantly narrow
10 the issues so that any Court intervention is more limited in nature.

11 Dated this 15th day of December, 2016.

RANDAZZA LEGAL GROUP, PLLC

/s/ Marc J. Randazza

Marc J. Randazza (NV Bar No. 12265)
Alex J. Shepard (NV Bar No. 13582)
4035 S. El Capitan Way
Las Vegas, NV 89147

*Attorneys for Defendant,
Consumer Opinion LLC*

THE AMIN LAW GROUP, NV., LTD.

/s/ Ismail Amin

Ismail Amin, Esq. (NV Bar No. 9343)
Lawrence Kulp, Esq. (NV Bar No. 7411)
Breane Stryker, Esq. (NV Bar No. 13594)
3960 Howard Hughes Parkway, Suite 500
Las Vegas, Nevada 89169

*Attorneys for Plaintiff,
Abbey Dental Center, Inc.*

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE

Dated: December 21, 2016