

OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.  
SANTOVITO FARGO TOWER  
SUITE 1500, 3800 HOWARD HUGHES PARKWAY  
LAS VEGAS, NV 89169  
TELEPHONE: 702.369.6800

1 ANTHONY L. MARTIN  
Nevada Bar No. 8177  
2 [anthony.martin@ogletreedeakins.com](mailto:anthony.martin@ogletreedeakins.com)  
3 JILL GARCIA  
Nevada Bar No. 7805  
4 [jill.garcia@ogletreedeakins.com](mailto:jill.garcia@ogletreedeakins.com)  
5 SHELLEY MURRAY  
Nevada Bar No. 12831  
6 [shelley.murray@ogletreedeakins.com](mailto:shelley.murray@ogletreedeakins.com)  
7 OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.  
Wells Fargo Tower  
3800 Howard Hughes Parkway, Suite 1500  
8 Las Vegas, NV 89169  
Telephone: 702.369.6800 / Fax: 702.369.6888

9  
10 Attorneys for Defendants Eldorado Resorts Corporation,  
Michael Marrs, Kristen Beck, and Dominic Taleghani

11 **UNITED STATES DISTRICT COURT**  
12 **FOR THE DISTRICT OF NEVADA**

13 SANDY BAGSBY,  
14  
15 Plaintiff,

Case No.: 2:15-cv-02330-RFB-PAL

16 vs.

**STIPULATION AND ORDER TO  
EXTEND TIME TO FILE DISPOSITIVE  
MOTIONS AND RESPONSES AND  
REPLIES THERETO  
(FIRST REQUEST)**

17 ELDORADO RESORTS CORPORATION, a  
Florida Corporation; MICHAEL MARRS;  
18 KRISTEN BECK; DOMINIC TALEGHANI;  
and DOES 1-50, inclusive,  
19  
20 Defendants.

21 Pursuant to LR IA 6-1, LR IA 6-2, and LR 26-4, Plaintiff Sandy Bagsby (“Plaintiff”) and  
22 Defendants Eldorado Resorts Corporation (“Eldorado”), Michael Marrs (“Marrs”), Kristen Hayde  
23 (formerly known as Beck) (“Hayde”), and Dominic Taleghani (“Taleghani”) (collectively  
24 “Defendants”), by and through their undersigned counsel, hereby stipulate and agree to this first  
25 request for extension of time for the parties to file dispositive motions in this action, along with  
26 related responses and replies. Pursuant to the Court’s March 31, 2017, Order for Extension of  
27  
28

1 Discovery Deadlines (ECF No. 43), the current deadline for filing dispositive motions in this case  
2 is June 22, 2017. The parties have completed all discovery in this matter and good cause exists for  
3 the proposed extension based upon the following:

4 As the Court is aware, this case is one of over thirty related lawsuits sitting before this  
5 Court. Recognizing the complexity of litigating these lawsuits simultaneously, the parties agreed  
6 to divide the cases into five groups and stagger deadlines in order to streamline the litigation  
7 process and avoid overlapping dispositive motion deadlines. On March 30, 2017, the parties  
8 agreed to a comprehensive briefing schedule for dispositive motions in the remaining groups of  
9 cases. (ECF No. 42.) The current status of the comprehensive briefing schedule is as follows:

10 Group III(A)

- 11 • Defendants shall file dispositive motions by February 27, 2017.
- 12 • Plaintiffs shall file oppositions by March 29, 2017.
- 13 • Defendants shall file replies by April 28, 2017.

14 Group III(B)

- 15 • Defendants shall file dispositive motions by March 23, 2017.
- 16 • Plaintiffs shall file oppositions by April 24, 2017.
- 17 • Defendants shall file replies by May 24, 2017.

18 Group IV(A)

- 19 • Defendants shall file dispositive motions by April 13, 2017.
- 20 • Plaintiffs shall file oppositions by May 12, 2017.
- 21 • Defendants shall file replies by June 13, 2017.

22 Group IV(B)

- 23 • Defendants shall file dispositive motions by June 6, 2017.
- 24 • Plaintiffs shall file oppositions by July 6, 2017.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

- Defendants shall file replies by August 7, 2017.

Group V

- Defendants shall file dispositive motions by June 22, 2017.
- Plaintiffs shall file oppositions by July 24, 2017.
- Defendants shall file replies by August 23, 2017.

In compliance with that stipulation, Defendants filed Motions for Summary Judgment on February 27, 2017, in Barnes v. Eldorado Resorts Corp., Case No.: 2:15-cv-01026-RFB-PAL (ECF No. 60); Kaplan v. Eldorado Resorts Corp., Case No.: 2:15-cv-01015-RFB-PAL (ECF No. 57); D. Parr v. Eldorado Resorts Corp., Case No.: 2:15-cv-01028-RFB-PAL (ECF No. 50); and Scheinberg v. Eldorado Resorts Corp., Case No.: 2:15-cv-01031-RFB-PAL (ECF No. 63). Unilaterally and without notice to defense counsel, on the day before oppositions were due, Plaintiffs filed a request for an extension to file oppositions to the Motions for Summary Judgment on March 28, 2017, in the foregoing cases: Barnes v. Eldorado Resorts Corp., Case No.: 2:15-cv-01026-RFB-PAL (ECF No. 63); Kaplan v. Eldorado Resorts Corp., Case No.: 2:15-cv-01015-RFB-PAL (ECF No. 60); D. Parr v. Eldorado Resorts Corp., Case No.: 2:15-cv-01028-RFB-PAL (ECF No. 53); and Scheinberg v. Eldorado Resorts Corp., Case No.: 2:15-cv-01031-RFB-PAL (ECF No. 66), seeking to extend the current filing date of March 29, 2017, to April 12, 2017. This request remains pending before the Court. Due to this delay, the entire comprehensive briefing schedule has been impacted, causing overlapping and unreasonable deadlines. The delays will make it difficult to comply with the current briefing schedules for the remaining matters.

...  
...  
...  
...

1 Accordingly, the parties hereby stipulate to adjust the briefing schedule in the manner  
2 presented below in an effort to allow the parties to comply with the briefing schedule in a  
3 reasonable manner as follows:

4 Group III(A)

- 5 • Plaintiffs shall file oppositions by April 12, 2017.
- 6 • Defendants shall file replies by May 12, 2017.

7 Group III(B)

- 8 • Plaintiffs shall file oppositions by May 8, 2017.
- 9 • Defendants shall file replies by June 7, 2017.

10 Group IV(A)

- 11 • Defendants shall file dispositive motions by May 31, 2017.
- 12 • Plaintiffs shall file oppositions by June 30, 2017.
- 13 • Defendants shall file replies by July 31, 2017.

14 Group IV(B)

- 15 • Defendants shall file dispositive motions by June 21, 2017.
- 16 • Plaintiffs shall file oppositions by July 21, 2017.
- 17 • Defendants shall file replies by August 21, 2017.

18 Group V

- 19 • Defendants shall file dispositive motions by August 30, 2017.
- 20 • Plaintiffs shall file oppositions by September 29, 2017.
- 21 • Defendants shall file replies by October 30, 2017.

22 As relevant to this matter, the parties have agreed that the dispositive motion deadlines should  
23 be extended as follows:

- 24 • Defendants shall file their dispositive motion no later than **August 30, 2017**;

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

- Plaintiff shall file any response to Defendants’ dispositive motion no later than **September 29, 2017**;
- Defendants shall file their reply no later than **October 30, 2017** (as the 30<sup>th</sup> day is Sunday, October 29, 2017).

This stipulation is not brought for purposes of delay or any other improper purpose.

Dated this 10th day of April, 2017.

WATKINS & LETOFSKY, LLP

OGLETREE, DEAKINS, NASH, SMOAK  
& STEWART, P.C.

/s/ Daniel R. Watkins

/s/ Jill Garcia

Daniel R. Watkins  
Brian S. Letofsky  
8215 S. Eastern Avenue  
Suite 265  
Las Vegas, NV 891123  
Attorneys for Plaintiff Raymond Coury

Anthony L. Martin  
Jill Garcia  
Shelley Murray  
3800 Howard Hughes Parkway  
Suite 1500  
Las Vegas, NV 89169  
Attorneys for Defendants Eldorado Resorts  
Corporation, Michael Marrs, Kristen Beck and  
Dominic Taleghani

**ORDER**

IT IS SO ORDERED.



UNITED STATES DISTRICT JUDGE

DATED: April 11, 2017