MORRIS LAW GROUP 1 Rosa Solis-Rainey, Bar No. 7921 2 Email: rsr@morrislawgroup.com 900 Bank of America Plaza 3 300 South Fourth Street Las Vegas, NV 89101 4 Telephone: (702) 474-9400 Facsimile: (702) 474-9422 5 Attorney for Defendants 6 Eleven23 Marketing, LLC and Armen Gharabegian 7 8 UNITED STATES DISTRICT COURT 9 DISTRICT OF NEVADA 10 CORT BUSINESS SERVICES

Case No. 2:15-cv-02454-GMN-PAL

CORPORATION,

Plaintiff,

v.

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ELEVEN23 MARKETING, LLC; ARMEN GHARABEGIAN; LOUNGE 22, LLC; and ETHOS DESIGN, LLC,

Defendants.

STIPULATION AND ORDER TO EXTEND TIME TO **RESPOND TO COMPLAINT** 

(First Request)

Pursuant to Local Rules 6-1(a), 6-2 and 7-1, and Federal Rule of Civil Procedure 6(b), Defendants Armen Gharabegian and Eleven23 Marketing, LLC (d/b/a Lounge 22, d/b/a Ethos Design), erroneously sued as Lounge 22, LLC and Ethos Design, LLC (collectively, the "Defendants") and Plaintiff CORT Business Services Corporation ("CORT" or "Plaintiff"), by and through their respective counsel of record, hereby stipulate as follows:

WHEREAS, on November 25, 2015, Defendants filed a civil complaint against CORT in the State of California for the County of Los Angeles, styled as Eleven23 Marketing, LLC and Armen Gharabegian v. CORT Business Services Corporation, Case No. EC064472;

MORRIS LAW GROUP	) BANK OF AMERICA PLAZA · 300 SOUTH FOURTH STREET · LAS VEGAS, NEVADA 89101	702/474-9400 · FAX 702/474-9422
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WHEREAS, on January 8, 2016, CORT filed a Notice of Removal of the civil complaint styled as *Eleven23 Marketing*, *LLC and Armen Gharabegian v*. CORT Business Services Corporation, Case No. EC064472, seeking removal of the matter to the U.S. District Court for the Central District of California pursuant to 28 U.S.C. § 1441(a), based on federal question and diversity jurisdiction;

WHEREAS, on January 15, 2016, CORT filed a Motion to Dismiss or, In the Alternative, to Transfer Case to the District of Nevada in the matter before the U.S. District Court for the Central District of California, Case No. 2:16-CV-00167;

WHEREAS, CORT's Motion to Dismiss or, In the Alternative, to Transfer Case to the District of Nevada is scheduled to be heard in the U.S. District Court for the Central District of California on February 22, 2016;

WHEREAS, Defendants Eleven23, Lounge 22, Ethos Design and Armen Gharabegian were served on different dates between December 28, 2015 and January 18, 2016;

WHEREAS, Defendants have requested, and CORT has consented to, an extension of the time for Defendants to respond to CORT's Complaint to February 26, 2016;

WHEREAS, Rule 6(b) requires the Court to approve an extension of time for Defendants to file an answer, and therefore the Parties collectively request the Court approve the agreement, as set forth below:

- This is the Parties' first stipulation for an enlargement of a. time to respond to the Complaint;
- The Parties stipulate and agree that the deadline for b. Defendants to file an answer or otherwise respond to CORT's Complaint shall be extended to February 26, 2016; and

1	c. This stipulation is not made for purposes of delay.		
2	IT IS SO STIPULATED.		
3	Dated this 20th day of January, 2016.		
4	DUANE MORRIS LLP	MORRIS LAW GROUP	
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6	By: /s/Alice Snedeker	By: /s/Rosa Solis-Rainey	
7	Alice Snedeker (Pro Hac Vice) 1075 Peachtree St. NE, Ste. 2000	Rosa Solis-Rainey, No. 7921 900 Bank of America Plaza	
8	Atlanta, GA 30309-3929	300 South Fourth Street Las Vegas, Nevada 89101	
9	DUANE MORRIS LLP Dominica C. Anderson, No. 2988	Attorney for Defendants	
11	Daniel B. Heidtke, No. 12975	Eleven23 Marketing, LLC and	
12	100 N. City Parkway, Ste. 1560 Armen Gharabegian   Las Vegas, Nevada 89106		
13	Attorneys for Plaintiff CORT Business Services Corporation		
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16	ORDER		
17	IT IS SO ORDERED.		
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19	DATED:_ February 1, 2016		
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21	UNITED TATES MAGISTRATE JUDGE		
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