1 2 3 4 5	Deverie Christensen, Bar No. 6596 christensend@jacksonlewis.com <b>JACKSON LEWIS P.C.</b> 3800 Howard Hughes Parkway, Suite 600 Las Vegas, Nevada 89169 Tel: (702) 921-2460 Fax: (702) 921-2461 Attorneys for Defendant <i>Harrah's Las Vegas, LLC</i>		
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8	UNITED STATES DISTRICT COURT		
9	DISTRICT OF NEVADA		
	KARLA K. KWIST, an individual;		
10 11	Plaintiff,	Case No.: 2:16-cv-00095-JCM-PAL	
12	v.	STIPULATION AND ORDER TO EXTEND	
13	HARRAH'S LAS VEGAS, LLC, a Nevada limited liability company; DOES 1 through	DEADLINE FOR PLAINTIFF TO FILE AMENDED COMPLAINT AND DEFENDANT	
14	10 inclusive; ROE CORPORATIONS/ENTITIES 1 through	TO FILE RESPONSIVE PLEADING TO AMENDED COMPLAINT (Second Request)	
15	10 inclusive,		
16	Defendants.		
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18	Defendant Harrah's Las Vegas, LLC ("Defendant"), by and through its counsel of record,		
19	Jackson Lewis P.C., and Plaintiff Karla K. Kwist ("Plaintiff"), by and through her counsel of		
20	record, The Thater Law Group, P.C., hereby stipulate and agree to extend the time for Plaintiff to		
20	file an Amended Complaint for one week, up to and including April 25, 2016, and for Defendant		
21 22	to thereafter file a responsive pleading to Plaintiff's Amended Complaint pursuant to applicable		
22	Court Rules.		
23	The parties collectively request this extension for the following reasons:		
24	• On June 5, 2014, Plaintiff dual-filed a charge of discrimination with the Nevada Equal		
23 26	Rights Commission ("NERC") and U.S. Equal Employment Opportunity Commission		
20 27	("EEOC"). On August 31, 2015, the NERC closed its case. On October 14, 2015, the		
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1	EEOC issued a right to sue notice, and on January 15, 2016, Plaintiff filed the instant	
2	lawsuit (Case 2:16-cv-00095-JCM-PAL).	
3	• On October 29, 2015, Plaintiff dual-filed a new charge of discrimination with the	
4	NERC and EEOC, and requested the immediate issuance of a right to sue notice. On	
5	February 4, 2016, the NERC closed its case due to Plaintiff's request for an immediate	
6	right to sue notice from the EEOC.	
7	• On February 26, 2016, the Court granted a proposed stipulation of the parties	
8	extending the time for Defendant to file a response to Plaintiff's original complaint, up	
9	to and including April 18, 2016, in anticipation of the EEOC issuing a right to sue	
10	notice to Plaintiff within the next 30-45 calendar days; thereafter, Plaintiff planned to	
11	file an amended complaint to include all of her claims against Defendant in one case.	
12	• The EEOC has now issued Plaintiff a right to sue notice, and Plaintiff needs a short	
13	time to prepare an amended complaint.	
14	• Plaintiff will amend her complaint to include all of her claims against Defendant,	
15	specifically those in her new charge.	
16	• Defendant's undersigned counsel has been authorized by Defendant to accept service	
17	of Plaintiff's amended complaint (once filed).	
18	• Thus, the parties are requesting a one-week extension of the time for Plaintiff to	
19	prepare and file her amended complaint. Thereafter, Defendant's counsel will accept	
20	service of the amended complaint and Defendant will file a response to the amended	
21	complaint pursuant to Court Rules.	
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1	This stipulation and order is sought in good faith and not for the purpose of delay. This is	
2	the second request for an extension of time.	
3	Dated this 18th day of April, 2016.	
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5	THE THATER LAW GROUP, P.C.	JACKSON LEWIS P.C.
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7	/s/ M. Lani Esteban-Trinidad	/s/ Deverie J. Christensen
8	M. Lani Esteban-Trinidad, Esq., Bar #6967 6390 W. Cheyenne Ave., Ste. A	Deverie J. Christensen, Bar No. 6596 3800 Howard Hughes Parkway, Suite 600
9	Las Vegas, Nevada 89108 Attorney for Plaintiff	Las Vegas, Nevada 89169 Attorneys for Defendant
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11	ORDER	
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13	IT IS SO ORDERED	April 20 <sub>, 2016.</sub>
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15		June a Sec
16	Ū	.S. District/Magistrate Judge
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