

1 Deverie Christensen, Bar No. 6596
 christensend@jacksonlewis.com
 2 **JACKSON LEWIS P.C.**
 3800 Howard Hughes Parkway, Suite 600
 3 Las Vegas, Nevada 89169
 Tel: (702) 921-2460
 4 Fax: (702) 921-2461
 Attorneys for Defendant
 5 *Harrah's Las Vegas, LLC*

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 8 **UNITED STATES DISTRICT COURT**
 9 **DISTRICT OF NEVADA**

10 **KARLA K. KWIST, an individual;**

11 **Plaintiff,**

12 **v.**

13 **HARRAH'S LAS VEGAS, LLC, a Nevada**
 limited liability company; DOES 1 through
 14 10 inclusive; ROE
 CORPORATIONS/ENTITIES 1 through
 15 10 inclusive,

16 **Defendants.**

Case No.: 2:16-cv-00095-JCM-PAL

STIPULATION AND ORDER TO EXTEND
DEADLINE FOR DEFENDANT TO FILE
RESPONSIVE PLEADING TO COMPLAINT

17 Defendant Harrah's Las Vegas, LLC ("Defendant"), by and through its counsel of record,
 18 Jackson Lewis P.C., and Plaintiff Karla K. Kwist ("Plaintiff"), by and through her counsel of
 19 record, The Thater Law Group, P.C., hereby stipulate and agree to extend the time for Defendant
 20 to file a responsive pleading to Plaintiff's Complaint for sixty (60) days, from February 16, 2016
 21 up to and including April 18, 2016.

22 The parties collectively request this extension for the following reasons:

- 23 • On June 5, 2014, Plaintiff dual-filed a charge of discrimination with the Nevada Equal
 24 Rights Commission ("NERC") and U.S. Equal Employment Opportunity Commission
 25 ("EEOC"). On August 31, 2015, the NERC closed its case. On October 14, 2015, the
 26 EEOC issued a right to sue notice, and on January 15, 2016, Plaintiff filed the instant
 27 lawsuit (Case 2:16-cv-00095-JCM-PAL).
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- On October 29, 2015, Plaintiff dual-filed a new charge of discrimination with the NERC and EEOC, and requested the immediate issuance of a right to sue notice. On February 4, 2016, the NERC closed its case due to Plaintiff's request for an immediate right to sue notice from the EEOC.
- The parties anticipate the EEOC will issue a right to sue notice to Plaintiff within the next 30-45 calendar days.
- Upon receipt, Plaintiff will amend her complaint to include all of her claims against Defendant, specifically those in her new charge.
- Defendant's undersigned counsel has been authorized by Defendant to accept service of Plaintiff's amended complaint (once filed).
- The parties believe it is most efficient for Plaintiff to receive the anticipated right to sue notice from the EEOC and amend her complaint so that the parties can litigate, and Defendant can respond to, all of Plaintiff's claims at once in the present case.
- Thus, the parties are requesting a sixty (60) day extension of the time for Defendant to respond to the current complaint, so that Plaintiff can first obtain the anticipated right to sue from the EEOC and amend her complaint to include all of her claims against Defendant. Thereafter, Defendant's counsel will accept service of the amended complaint and Defendant will file a response to the amended complaint.

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This stipulation and order is sought in good faith and not for the purpose of delay. No prior request for any extension of time has been made.

Dated this 16th day of February, 2016.

THE THATER LAW GROUP, P.C.

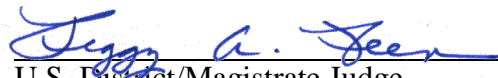
JACKSON LEWIS P.C.

/s/ M. Lani Esteban-Trinidad
M. Lani Esteban-Trinidad, Esq., Bar #6967
6390 W. Cheyenne Ave., Ste. A
Las Vegas, Nevada 89108
Attorney for Plaintiff

/s/ Deverie J. Christensen
Deverie J. Christensen, Bar No. 6596
3800 Howard Hughes Parkway, Suite 600
Las Vegas, Nevada 89169
Attorneys for Defendant

ORDER

IT IS SO ORDERED _____ February 26, 2016.



U.S. District/Magistrate Judge

4815-9177-8350, v. 1