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6 *Attorneys for Defendants*

7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 CAMERON E. OLIVER, individually and on
 10 behalf of others similarly situated,

CASE NO.: 2:16-cv-00305-JAD-PAL

11 Plaintiff,

**STIPULATION TO STAY ALL
 PROCEEDINGS FOR**

12 v.

(Second Request)

13 BELL TRANS, a Nevada Corporation, and
 14 BRENT J. BELL,

15 Defendants.

16 Plaintiff Cameron Oliver (“Plaintiff”), by and through his counsel of record, and Defendants
 17 Bell Trans and Brent Bell (“Defendants”), by and through their counsel of record, submit the
 18 below stipulation to stay all proceeding in the above captioned matter. The purpose of this stay is
 19 to allow the parties to engage in meaningful settlement discussions in an effort to fully and finally
 20 resolve this dispute. Since the parties’ prior request to stay was granted, their negotiations have
 21 resulted in an agreement to jointly mediate this case with a related case (also before this Court) in
 22 an effort to reach a global resolution as to both matters. For these reasons, the parties now
 23 respectfully request additional time to allow for the analysis of wage and hour data in these related
 24 matters so that they will not be required to duplicate costs and efforts by mediating both matters
 25 separately.

26 The parties therefore stipulate and agree that:

- 27 1. The above captioned dispute shall be stayed for a period of 72 days commencing on
- 28 August 12, 2016, and ending October 23, 2016 (the “Stay Period”);

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2. The Stay Period is calculated to allow this matter to be stayed so that it can be meditated at the same time as the parties mediate a related class/collective action matter that is also presently before this Court, Case No. 2:15-cv-01066-MMD-PAL, *Willie Thurmond v. Presidential Limousine* (“Thurmond Matter”). A stipulation to stay all proceedings in that matter until October 23, 2016, was recently granted by the Court on July 29, 2016.

3. Since the last stay ordered by the Court in this matter, the parties have worked to identify a list of putative class members in this matter. This list was subsequently provided to Plaintiff, and Plaintiff selected 10% of the individuals on the list for which Plaintiff would need detailed wage and hour information in order to prepare for mediation. Defendants began compiling this information but had difficulty exporting the data from Defendants’ information systems into a searchable format that would allow Plaintiff to efficiently analyze the data. Once Defendants were finally able to export the data, a review of the information (conducted in preparation for production) revealed that a systemic error had occurred when Defendants attempted to export the data in bulk. That error resulted in inaccurate and incomplete data results. Thereafter, Defendants set to re-compile the requested data. While repeating this process was arduous and time-consuming, it was necessary in order to provide Plaintiff with complete and accurate information. Accordingly, the parties respectfully request additional time to now allow Plaintiff a meaningful opportunity to analyze Defendants’ data prior to mediation.

4. If the parties do not resolve this dispute during the Stay Period and do not request an additional stay from the Court to continue settlement negotiations, the parties agree to jointly submit within seven calendar days after the end of the Stay Period: (1) a new Discovery Plan and Scheduling Order; and (2) a briefing schedule for purposes of responding to Defendants’ pending motions (Docket Nos. 7 and 8).

1 5. The forgoing request for stay is made in good faith to enable the parties to engage
2 in meaningful settlement dialogue and not for the purpose of delay.

3 DATED this 19th day of August, 2016.

<p>5 BY: <u>/s/ Dana Sniegocki, Esq.</u> 6 LEON GREENBERG, ESQ. 7 NV Bar No. 8094 8 leongreenberg@overtimelaw.com 9 DANA SNIEMOCKI, ESQ. 10 NV Bar No. 11715 11 dana@overtimelaw.com 12 LEON GREENBERG PROFESSIONAL 13 CORPORATION 14 2965 South Jones Blvd – Suite E3 15 Las Vegas, Nevada 89146 16 Telephone: (702) 383-6085 17 Fax: (702) 385-1827</p> <p><i>Attorneys for Plaintiff</i></p>	<p>5 BY: <u>/s/ Peter D. Navarro, Esq.</u> 6 ANTHONY L. HALL, ESQ. 7 Nevada Bar No. 5977 8 ahall@hollandhart.com 9 PETER D. NAVARRO, ESQ. 10 Nevada Bar No. 10168 11 pdnavarro@hollandhart.com 12 HOLLAND & HART LLP 13 5441 Kietzke Lane, Second Floor 14 Reno, Nevada 89511 15 Telephone: (775) 327-3000 16 Fax: (775) 786-6179</p> <p><i>Attorneys for Defendants</i></p>
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14 IT IS SO ORDERED:

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16 
17 United States Magistrate Judge

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