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# UNITED STATES DISTRICT COURT

### DISTRICT OF NEVADA

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

Plaintiff,

v.

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

Defendants.

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

## JOINT NOTICE OF SETTLEMENT AND STIPULATION AND ORDER TO STAY ALL PROCEEDINGS

(SIXTH REQUEST)

(Second Request Regarding Submission of Settlement Documents)

Defendants Bell Trans and Brent J. Bell (collectively, "Bell Trans" or "Defendants"), and Plaintiff Cameron E. Oliver, ("Plaintiff"), through their counsel of record, submit the below stipulation to extend the stay of all proceedings in the above captioned matter. On June 19, 2017, after being notified that the parties had agreed to settle, on a collective and class-wide basis, all disputed and claims related to this litigation and related litigation (Case No. 2:15-cv-01066-MMD-PAL, Willie Thurmond v. Presidential Limousine), the Court granted the parties' stipulation to stay this matter until July 27, 2017 in order to allow the parties time to set forth in greater detail the terms of the parties' settlement, as well as to allow Plaintiff's counsel time to file a motion seeking the Court's approval of the settlement terms. ECF No. 45. While the parties have been working to that end, they require additional time to finalize the necessary settlement documents and respectfully stipulate as follows:

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The parties agree to stay all proceedings in the above captioned matter for a period of 32 additional days beyond the current stay, ending on July 27, 2016, to allow for the preparation and finalization of appropriate settlement documents. As set forth herein, this is the parties' second request to stay this matter for the purpose of memorializing their negotiations into settlement documents. If this stipulation is granted the current stay shall be extended until Monday, August 28, 2017.

The forgoing request for stay is made in good faith not for the purpose of delay.

DATED this 27th day of June, 2017.

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Attorneys for Defendants

### **ORDER**

### IT IS SO ORDERED.

Dated: July 28, 2017

United States District Judge

HOLLAND & HART LLP

By: /s/ Peter D. Navarro, Esq.
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