

1 LEON GREENBERG, ESQ., SBN 8094  
 2 DANA SNIEMOCKI, ESQ., SBN 11715  
 3 Leon Greenberg Professional Corporation  
 4 2965 South Jones Blvd- Suite E3  
 5 Las Vegas, Nevada 89146  
 6 Tel (702) 383-6085  
 7 Fax (702) 385-1827  
 8 leongreenberg@overtimelaw.com  
 9 dana@overtimelaw.com

10 **UNITED STATES DISTRICT COURT**  
 11 **DISTRICT OF NEVADA**

12 CAMERON E. OLIVER, Individually and on  
 13 behalf of others similarly situated,

14 Plaintiff,

15 vs.

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

18 Defendants.

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

**JOINT NOTICE OF SETTLEMENT  
 AND  
 STIPULATION AND ORDER TO  
 STAY ALL PROCEEDINGS  
 (NINTH REQUEST)**

(Fifth Request Regarding Submission of  
 Settlement Documents)

ECF No. 52

19 Plaintiff Cameron E. Oliver, (“Plaintiff”) and Defendants Bell Trans and Brent J. Bell  
 20 (collectively, “Bell Trans” or “Defendants”), through their counsel of record, submit the below  
 21 stipulation to extend the stay of all proceedings in the above captioned matter. On June 19, 2017,  
 22 after being notified that the parties had agreed to settle, on a collective and class-wide basis, all  
 23 disputes and claims related to this litigation and related litigation (“Related Litigation”) (Case  
 24 No. 2:15-cv-01066-MMDPAL, *Willie Thurmond v. Presidential Limousine*), the Court granted  
 25 the parties’ stipulation to stay this matter until July 27, 2017 in order to allow the parties time to  
 26 set forth in greater detail the terms of the parties’ settlement, as well as to allow Plaintiff’s  
 27 counsel time to file a motion seeking the Court’s approval of the settlement terms. ECF No. 45.  
 28 The Court extended that requested stay pursuant to the parties’ further stipulations and orders,

1 the most recent such order continuing the stay of this matter until November 13, 2017. ECF No.  
2 51. The primary reason for the instant extension is to allow the parties to finalize separate  
3 settlement agreements for this matter and the Related Litigation. While the parties had reached  
4 an agreement on all of the necessary substantive terms of a resolution of this case and the  
5 Related Litigation, they had to resolve various unanticipated, and potentially complex,  
6 procedural and mechanical issues regarding how those agreements would be structured and  
7 presented to the Court. To that end, the parties require additional time and respectfully stipulate  
8 as follows:  
9

10           The parties agree to stay all proceedings in the above captioned matter for a period of 48  
11 additional days beyond the current stay, which ended on November 13, 2017, to allow for the  
12 preparation and finalization of appropriate settlement documents. As set forth herein, this is the  
13 parties' fifth request to stay this matter for the purpose of memorializing their negotiations into  
14 settlement documents. If this stipulation is granted, the current stay shall be extended until  
15 Tuesday, January 9, 2017.  
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17           The forgoing request for stay is made in good faith not for the purpose of delay.  
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Dated: December 5, 2017

Dated: December 5, 2017

Respectfully submitted,


Respectfully submitted,

/s/ Leon Greenberg  
LEON GREENBERG, ESQ.  
DANA SNIEGOCKI, ESQ.  
LEON GREENBERG  
PROFESSIONAL CORPORATION  
2965 South Jones Blvd., #E3  
Las Vegas, NV 89146  
Tel (702) 383-6085  
Fax (702) 385-1827  
Attorneys for Plaintiffs

/s/ Peter Navarro  
ANTHONY L. HALL, ESQ.  
PETER NAVARRO, ESQ.  
HOLLAND & HART LLP  
5441 Kietzke Lane, Second Floor  
Reno, NV 89511  
Tel: (775) 327-3000  
Fax: (775) 786-6169  
Attorneys for Defendants

**ORDER**

Based on the parties' stipulation [ECF No. 52] and good cause appearing, IT IS HEREBY ORDERED that the stipulation is approved. The stay is extended (nunc pro tunc from 11/13/17) to January 9, 2018. If the stipulation and order to dismiss is not filed by 1/9/18, the parties must appear for a status conference on 1/12/18 at 9:30 a.m. If the stipulation and dismissal order is timely filed, it should include the instruction to vacate this status conference.

  
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U.S. District Judge Jennifer Dorsey  
December 7, 2017