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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
 (TENTH REQUEST)**

(Sixth Request Regarding Submission of
 Settlement Documents)

19 Plaintiff Cameron E. Oliver, (“Plaintiff”) and Defendants Bell Trans and
 20 Brent J. Bell (collectively, “Bell Trans” or “Defendants”), through their counsel of
 21 record, submit the below stipulation to extend the stay of all proceedings in the
 22 above captioned matter. On June 19, 2017, after being notified that the parties had
 23 agreed to settle, on a collective and class-wide basis, all disputes and claims related
 24 to this litigation and related litigation (“Related Litigation”) (Case No. 2:15-cv-
 25 01066-MMDPAL, *Willie Thurmond v. Presidential Limousine*), the Court granted
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1 the parties' stipulation to stay this matter until July 27, 2017 in order to allow the
2 parties time to set forth in greater detail the terms of the parties' settlement, as well
3 as to allow Plaintiff's counsel time to file a motion seeking the Court's approval of
4 the settlement terms. ECF No. 45. The Court extended that requested stay
5 pursuant to the parties' further stipulations and orders, the most recent such order
6 continuing the stay of this matter until January 9, 2018. ECF No. 53. The primary
7 reason for the instant extension is to allow the parties to finalize separate
8 settlement agreements for this matter and the Related Litigation. While the parties
9 had reached an agreement on all of the necessary substantive terms of a resolution
10 of this case and the Related Litigation, they had to resolve various unanticipated,
11 and potentially complex, procedural and mechanical issues regarding how those
12 agreements would be structured and presented to the Court.
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19 The parties were having difficulties resolving the foregoing issues. Within
20 the past two days, the parties have made substantial process and conferred and
21 communicated about what they hope is the resolution of all of the issues necessary
22 to finalize the settlement and prepare a stipulation of settlement for the Court's
23 review. Based upon plaintiff's counsel's communication of January 10, 2018 with
24 court staff member, Danielle, the parties are jointly submitting this stipulation to
25 extend the current stay, *nunc pro tunc*, for a period of 30 days from January 9,
26 2018 through February 8, 2018. The parties are also mindful that the Court will be
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1 setting a status check at which the parties are expected to appear some time after
2 the expiration of the requested stay on February 8, 2018. The parties aim to, and
3 are hopeful they will, have a motion filed with the Court seeing preliminary
4 approval of their proposed settlement prior to February 8, 2018.
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6 Based upon the forgoing, the request for a continued stay is made in good
7 faith not for the purpose of delay.
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14 Dated January 10, 2018

Dated January 10, 2018

15 Respectfully submitted,

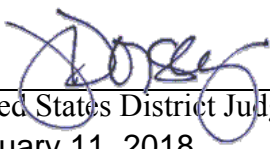
Respectfully submitted,

16
17 /s/ Leon Greenberg
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Attorneys for Defendants

ORDER

27 IT IS SO ORDERED:

28 
United States District Judge
January 11, 2018

Based on the parties' stipulation [ECF No. 54] and good cause appearing, IT IS ORDERED that the stipulation is granted. The stay is extended (nunc pro tunc from January 9, 2018) to February 8, 2018. IT IS FURTHER ORDERED that the parties appear for a status conference on February 12, 2018 at 3:00 p.m.