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7 Attorneys for Defendant
 Southern Nevada T.B.A. Co.
 8 d/b/a Ted Wiens Auto & Tire Centers

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

12 DANIEL ACUNA; and JERRY SCHAFFER, as)
 individuals, and on behalf of others similarly)
 13 situated,)
 14 Plaintiffs,)
 15 vs.)
 16 SOUTHERN NEVADA T.B.A. CO., a Nevada)
 Corporation, doing business as "TED WIENS)
 17 TIRE & AUTO CENTERS",)
 18 Defendants.)

Case No. 2:16-cv-00457-GMN-(GWF)

STIPULATION AND REQUEST
FOR
EXTENSION OF TIME TO
RESPOND PLAINTIFFS' MOTION
FOR CLASS CERTIFICATION
(Docket No. 23)
(First Request)

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 20 Pursuant to Local Rule 6-1, the undersigned parties stipulate and request that the Court
 21 grant a ten (10) day extension of the time for Defendant Southern Nevada T.B.A. Co. d/b/a Ted
 22 Wiens Tire & Auto Centers ("Ted Wiens") to respond to Plaintiffs' Motion for Class
 23 Certification (Docket No. 23). The requested extension would move the reply deadline from
 24 April 22, 2016 to May 2, 2016. In support of this Stipulation and Request, the parties state as
 25 follows:

- 26 1. Plaintiffs' filed Plaintiffs' Motion for Class Certification on April 5, 2016.
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2. Defendant's response/opposition is due April 22, 2016.

3. On April 15, 2016, Defendant filed an Emergency Motion to Extend Time to Respond to Plaintiffs' Motion to Certify Class Action (Docket No. 27), which by reason of the stipulation is mooted and hereby withdrawn.

4. On April 21, 2016, Plaintiffs' counsel agreed to extend the deadline to respond to the Motion for Class Certification to May 2, 2016.

5. This stipulation and request for the brief extension of time is not sought for any improper purpose or for delay. Rather, it is sought solely to facilitate the parties' consideration, review, discussion, and possible agreement designed to streamline the collective action certification and noticing process for the Fair Labor Standards Act Claim. This includes, but is not limited to, the procedure for noticing the proposed class of the 29 U.S.C. § 216(b) action, including but not limited to the procedures, form and content of the notice, the opt-in period, possible temporary tolling of the statute of limitations, and other relevant issues.

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1 WHEREFORE, the parties respectfully request that this Court extend the date for Ted
2 Wiens to respond to Plaintiffs' Motion for Class Certification from April 22, 2016 up to and
3 including May 2, 2016.

4 DATED this 22nd day of April, 2016.

5 LAW OFFICES OF STEVEN J. PARSONS KAMER ZUCKER ABBOTT

6
7 By: /s/ Andrew Rempfer By: /s/ Nicole A. Young

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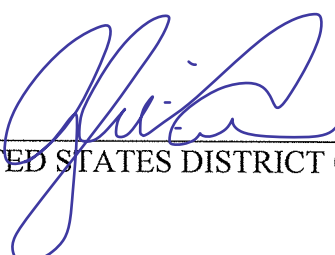
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22 Attorneys for Defendant
23 Southern Nevada T.B.A. Co.
24 d/b/a Ted Wiens Auto & Tire Centers

25 **ORDER**

26 **IT IS SO ORDERED.**

27 DATED: May 2, 2016

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UNITED STATES DISTRICT COURT JUDGE