

1 NICHOLAS J. SANTORO, ESQ.  
 Nevada Bar No. 0532  
 2 nsantoro@santoronevada.com  
 OLIVER J. PANCHERI, ESQ.  
 3 Nevada Bar No. 7476  
opancheri@santoronevada.com  
 4 JASON D. SMITH, ESQ.  
 Nevada Bar No. 9691  
 5 jsmith@santoronevada.com  
 SANTORO WHITMIRE  
 6 10100 W. Charleston Blvd., Suite 250  
 Las Vegas, Nevada 89135  
 7 Telephone: 702/948-8771  
 Facsimile: 702/948-8773

8 *Attorneys for Plaintiff Desert Palace, Inc.*

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 DESERT PALACE, INC., d/b/a CAESARS  
 12 PALACE, a Nevada corporation,

13 Plaintiff,

14 v.

15 ANDREW P. MICHAEL, an individual; DOES 1  
 16 through 10, inclusive; ROE CORPORATIONS 1  
 through 10, inclusive,

17 Defendants.

18 ANDREW P. MICHAEL, an individual,

19 Counterclaimant,

20 v.

21 DESERT PALACE, INC., d/b/a CAESARS  
 22 PALACE, a Nevada corporation; ROE  
 CORPORATIONS 1 through 10, inclusive,

23 Counterdefendant.

Case No.: 2:16-cv-0462-JAD-(GFW)

(From District Court, Clark County, Nevada,  
 Case No. A-15-720492-C)

**STIPULATION AND ~~PROPOSED~~**  
**ORDER TO EXTEND DEADLINE FOR**  
**PLAINTIFF TO FILE A RESPONSE TO**  
**DEFENDANT'S ANSWER AND**  
**COUNTERCLAIM**

24

25 Plaintiff DESERT PALACE, INC. a Nevada corporation doing business as CAESARS  
 26 PALACE (“*Caesars*” or “*Plaintiff*”), by and through its attorneys of record, Nicholas J.  
 27 Santoro, Esq., Oliver J. Pancheri, and Jason D. Smith, Esq., of the law firm of SANTORO  
 28 WHITMIRE, and Defendant ANDREW P. MICHAEL (“*Michael*” or “*Defendant*”), by and

SANTORO WHITMIRE  
 10100 W. Charleston Blvd., Suite 250, Las Vegas, Nevada 89135  
 (702) 948-8771 – fax (702) 948-8773

1 through his attorneys of record, Kenneth E. Hogan, Esq. and Jeffrey L. Hulet, Esq. of the law  
2 firm of Hogan Hulet PLLC, stipulate and agree, and request the Court's entry of an Order  
3 regarding the following:

4 1. On June 25, 2015, Plaintiff commenced the action against Defendant by filing a  
5 Complaint in state court. On March 3, 2016, Defendant filed his Notice of Removal. On March  
6 9, 2016, Defendant filed his Answer and Counterclaim. Plaintiff's response to the Answer and  
7 Counterclaim is due Monday, April 4, 2016.

8 2. The parties hereby stipulate and agree to extend Plaintiff's deadline to file a  
9 response to the Answer and Counterclaim for one week; specifically, that Plaintiff's deadline to  
10 file a response shall be extended up and through Monday, April 11, 2016.

11 3. The parties respectfully request the Court's entry of an Order extending Plaintiff's  
12 deadline as set forth above.

13 Dated this 4<sup>th</sup> day of April, 2016.

14 **SANTORO WHITMIRE**

15 /s/ Jason D. Smith  
16 NICHOLAS J. SANTORO, ESQ.  
Nevada Bar No. 532  
17 OLIVER J. PANCHERI, ESQ.  
Nevada Bar No. 7476  
18 JASON D. SMITH, ESQ.  
Nevada Bar No. 9691  
19 101000 W. Charleston Blvd., Suite 250  
Las Vegas, Nevada 89135  
20 Tel.: (702) 948-8771 / Fax: (702) 948-8773  
Email: nsantoro@santoronevada.com  
opancheri@santoronevada.com  
21 jsmith@santoronevada.com  
22 *Attorneys for Plaintiff Desert Palace, Inc.*

**HOGAN HULET PLLC**

15 /s/ Kenneth E. Hogan  
16 KENNETH E. HOGAN, ESQ.  
Nevada Bar No. 10083  
17 JEFFREY L. HULET, ESQ.  
Nevada Bar No. 10621  
18 7450 Arroyo Crossing Parkway, Suite 270  
Las Vegas, Nevada 89113  
19 Tel.: (702) 800-5482 / Fax: (702) 800-5482  
20 Email: ken@h2legal.com  
jeff@h2legal.com  
21 *Attorneys for Defendant Andrew P. Michael*

23 IT IS SO ORDERED:

24   
25 \_\_\_\_\_  
26 United States Magistrate Judge

27 Dated: April 5, 2016  
28 \_\_\_\_\_