

BLACK & LOBELLO
10777 W. Twain Avenue, 3rd Floor
Las Vegas, Nevada 89135
(702) 869-8801 FAX: (702) 869-2669

1 **STEVEN MACK, ESQ.**
2 **NEVADA BAR NO. 4000**
3 **BLACK & LOBELLO**
4 10777 W. Twain Ave., 3rd Fl.
5 Las Vegas, Nevada 89135
6 (702) 869-8801
7 (702) 869-2669 (fax)
8 smack@blacklobellolaw.com
9 Attorneys for Plaintiff/Counterdefendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

<p>10 COUNT’S KUSTOMS, LLC, a Nevada 11 corporation, 12 Plaintiff, 13 14 vs. 15 JOSEPH FRONTIERA, an individual, and 16 RANDSTAD PROFESSIONALS US, LP a 17 Delaware Corporation dba RANDSTAD 18 PROFESSIONALS, DOES I-X and DOE 19 CORPORATIONS XI – XX, inclusive, 20 21 Defendants.</p>	<p>Case No.: 2:16-cv-00910-JAD-GWF</p>
<p>22 23 RANDSTAD PROFESSIONALS US, LP, 24 25 Counterclaimant, 26 27 vs. 28 COUNT’S KUSTOMS, LLC, Counterdefendant.</p>	

STIPULATION AND ORDER TO VACATE STIPULATION
AND ORDER TO DISMISS DOCUMENT ECF 64 AND ENTER NEW ORDER ONLY
DISMISSING RANDSTAD PROFESSIONALS US, LP

COMES NOW Plaintiffs/Counterdefendant, COUNT’S KUSTOMS, LLC, a Nevada corporation (“Plaintiff”), by and through their attorneys BLACK & LOBELLO, and Defendant/Counterclaimant RANDSTAD PROFESSIONAL US, LP. d/b/a RANDSTAD

1 PROFESSIONALS (“Defendant”) by and through their attorneys BAUMAN LOEWE WITT &
2 MAXWELL, PPLC, and Defendant JOSEPH FRONTIERA (“Defendant”) by and through his
3 attorney Theresa Lillian Mains, Esq., and hereby stipulate and agree that the Stipulation and
4 Order to Dismiss [Doc 64] that was entered with this court on February 22, 2018 as [Doc 66] be
5 vacated as it erroneously states that “all claims by and against all parties hereto shall be
6 dismissed, each party to bear their own fees and costs; provided that this Court shall retain
7 jurisdiction to accept, file and enter any judgment by confession which may be filed by the
8 parties.” The Stipulation and Order to Dismiss was to state “all claims by and against
9 **RANDSTAD PROFESSIONALS US., LP dba RANDSTAD PROFESSIONALS** shall be
10 dismissed, each party to bear their own fees and costs; provided that this court shall retain
11 jurisdiction to accept, file and enter any judgment by confession which may be filed by the
12 parties.”

13
14
15 DATED this 27th day of February 2018

DATED this 27th day of February 2018

16 **BLACK & LOBELLO**

**BAUMAN LOEWE WITT
& MAXWELL, PPLC**

17
18 /s/ Steven Mack

/s/ Michael C. Mills

19 Steven Mack, Esq.
20 Nevada State Bar No. 4000
21 10777 West Twain Avenue, Suite 300
22 Las Vegas, Nevada 89135
23 *Attorneys for Plaintiffs/Counterdefendant*

Michael C. Mills, Esq.
Nevada Bar No. 003534
3650 N. Rancho Dr., Suite 114
Las Vegas, Nevada 89130
*Attorneys for Randstad Professionals US, LP
dba Randstad Professional*
Eric R. McDonough, Esq.
Amy A. Abeloff, Esq.
SEYFARTH SHAW LLP
2029 Century Park East, Ste. 3500
Los Angeles, CA 90067
*Attorneys for Randstad Professionals US, LP
dba Randstad Professionals*

24 Dated this ____ day of February 2018

25 _____
26 THERESA MAINS, ESQ. (NBN 13373)
27 2251 N. Rampart Blvd., #102
28 Las Vegas, NV 89128
theresa@theresamainspa.com
Attorney for Defendant
Joseph Frontiera

BLACK & LOBELLO
10777 W. Twain Avenue, 3rd Floor
Las Vegas, Nevada 89135
(702) 869-8801 FAX: (702) 869-2669

1 PROFESSIONALS (“Defendant”) by and through their attorneys BAUMAN LOEWE WITT &
2 MAXWELL, PPLC, and Defendant JOSEPH FRONTIERA (“Defendant”) by and through his
3 attorney Theresa Lillian Mains, Esq., and hereby stipulate and agree that the Stipulation and
4 Order to Dismiss [Doc 64] that was entered with this court on February 23, 2018 as [Doc 66] *be*
5 *vacated* as it erroneously states that “all claims by and against all parties hereto shall be
6 dismissed, each party to bear their own fees and costs; provided that this Court shall retain
7 jurisdiction to accept, file and enter any judgment by confession which may be filed by the
8 parties.”
9

10 The Stipulation and Order to Dismiss was to state “all claims by and against
11 **RANDSTAD PROFESSIONALS US., LP dba RANDSTAD PROFESSIONALS** shall be
12 dismissed, each party to bear their own fees and costs; provided that this court shall retain
13 jurisdiction to accept, file and enter any judgment by confession which may be filed by the
14 parties.”
15

16 DATED this ____ day of February 2018

DATED this ____ day of February 2018

17 **BLACK & LOBELLO**

**BAUMAN LOEWE WITT
& MAXWELL, PPLC**

18
19 _____
20 Steven Mack, Esq.
21 Nevada State Bar No. 4000
22 10777 West Twain Avenue, Suite 300
23 Las Vegas, Nevada 89135
24 *Attorneys for Plaintiffs/Counterdefendant*

20 Michael C. Mills, Esq.
21 Nevada Bar No. 003534
22 3650 N. Rancho Dr., Suite 114
23 Las Vegas, Nevada 89130
24 *Attorneys for Randstad Professionals US, LP*
25 *dba Randstad Professional*
26 Eric R. McDonough, Esq.
27 Amy A. Abeloff, Esq.
28 SEYFARTH SHAW LLP
2029 Century Park East, Ste. 3500
Los Angeles, CA 90067
Attorneys for Randstad Professionals US, LP
dba Randstad Professionals

24 Dated this 23 day of February 2018

25 _____
26 THERESA MAINS, ESQ. (NBN 13373)

27 2251 N. Rampart Blvd., #102
28 Las Vegas, NV 89128

theresa@theresamainspa.com

Attorney for Defendant

Joseph Frontiera

ORDER

The Court having considered the foregoing and good cause appearing that the prior Oder was made in error:

IT IS HEREBY ORDERED That the prior ORDER, entered as Docket Number 66, be set aside; and

IT IS FURTHER ORDERED that this matter be DISMISSED only as to RANDSTAD PROFESSIONALS, US, LP, d/b/a RANDSTAD PROFESSIONALS each party to bear their own attorneys' fees and costs. The actions remain as to Defendant JOSEPH FRONTIERA.

Dated: March 7, 2018.



U.S. DISTRICT COURT JUDGE

Respectfully submitted by:

BLACK & LOBELLO

/s/ Steve J. Mack
Steve J. Mack, Esq.
Nevada Bar No. 4000
10777 W. Twain Ave., Suite 300
Las Vegas, Nevada 89135
Attorney for Plaintiff/Counterdefendants

BLACK & LOBELLO
10777 W. Twain Avenue, 3rd Floor
Las Vegas, Nevada 89135
(702) 869-8801 FAX: (702) 869-2669

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28