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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10
 11 JONAH AMSEL; JULIO RIVERA; and,)
 EDUARDO MALTMAN,)

Case No.: 2:16-cv-00999-RFB-GWF

12)
 Plaintiffs,)

13 vs.)

**[PROPOSED] STIPULATION AND
 ORDER FOR EXTENSION OF TIME
 TO FOR PLAINTIFF’S TO RESPOND
 TO DEFENDANT ARISTOTELIS
 ELIADES’ MOTION FOR SUMMARY
 JUDGMENT**

14 DOUGLAS G. GERRARD; DOLORES)
 15 ELIADES; and, ARISTOTELIS ELIADES;)
 16 DOES I through X; and, ROES I through X’)
 17 inclusive,)

[SECOND REQUEST]

Defendants.)

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 19 Pursuant to Local Rules IA 6-1, LR IA 6-2, and LR 7-1, Plaintiffs JONAH AMSEL,
 20 JULIO RIVERA, and EDUARDO MALTMAN (“Plaintiffs”), by and through their undersigned
 21 counsel, James P. Kemp, Esq. and Victoria L. Neal, Esq., of the law firm of Kemp & Kemp, and
 22 Defendant ARISTOTELIS ELIADES (“Defendant”), by and through his undersigned counsel,
 23 Gregory A. Miles, Esq., of the law firm of Royal and Miles, hereby stipulate, subject to approval
 24 by the Court, to extend the time for Plaintiffs to respond to Defendant’s Motion For Summary
 25 Judgment.
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27 This is the second request for an extension of time for Plaintiffs to respond to Defendant
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1 Aristotelis Eliades’ Motion for Summary Judgement. This quest is sought in good faith and not
2 for purposes of undue delay.

3 **I. RELEVANT FACTS**

4 Discovery in this matter closed **June 16, 2017**. ECF No. 135. Because Plaintiffs’
5 deposition were taken late in the process, including one on June 15, 2017, and the need for the
6 transcripts to be reviewed and obtained, the parties stipulated to, and the court granted, an
7 extension of the dispositive motion deadline to **September 5, 2017**. ECF No. 141. On **August**
8 **1, 2017**, Defendant Aristotelis Eliades’ filed his motion for summary judgement. Plaintiffs’
9 response deadline is **August 22, 2017**. ECF No. 143. Counsel for Plaintiffs and Defendant
10 Aristotelis Eliades stipulated to an extension of Plaintiffs’ deadline to respond up to and
11 including September 19, 2017, which the Court granted. ECF No. 146. In the interim, Plaintiffs
12 and the Defendants Dolores Eliades and Douglas Gerrard stipulated to extend the dispositive
13 motion deadline up to and including September 19, 2017, which the Court granted. ECF No.
14 148. When the parties stipulated to extend the dispositive motion deadline for Defendants
15 Dolores Eliades and Douglas Gerrard, Plaintiffs reached out to Defendant Aristotelis Eliades to
16 request extending Plaintiffs responsive deadline again to account for the new conflict. **Id.** This
17 stipulation follows as a result and Plaintiffs and Defendant Aristotelis Eliades hereby stipulate,
18 subject to approval by the Court, that Plaintiffs deadline to respond be extended up to and
19 including October 10, 2017.
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23 **II. REASON FOR EXTENSION**

24 The extension is necessary primarily because of the extension of the dispositive motion
25 deadline for the other two Defendants in this matter, but also includes Plaintiffs’ counsels’ heavy
26 workload through September 15, 2017.
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1 Therefore, the parties agree that an extension of time is appropriate and stipulate that
2 Plaintiffs have up to and including October 10, 2017, subject to approval by the Court, in which
3 to respond to Defendant Aristotelis Eliades' motion for summary judgment.

4 Respectfully submitted,

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6 Dated this 15th day of September, 2017. Dated this 15th day of September, 2017.

7
8 /s/ Gregory A. Miles
9 _____
10 Gregory A. Miles, Esq.
11 ROYAL & MILES
12 1522 W. Warm Springs Road
13 Henderson, NV 89104
14 Phone: 702.471.6777
15 Facsimile: 702. 531.6777

16 Attorney for Defendant,
17 Aristotelis Eliades

8 /s/ Victoria L. Neal
9 _____
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19 Attorneys for Plaintiffs,
20 Amsel, Rivera, and Maltman

21 **ORDER**

22 **IT IS SO ORDERED:**

23 Dated: September 18, 2017.

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UNITED STATES DISTRICT COURT JUDGE
HONORABLE RICHARD F. BOULWARE

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CERTIFICATE OF SERVICE

This is to certify on the date indicated below the within and foregoing document was served via the court's CM/ECF system to the following persons or parties:

All Parties Registered
Through the CM/ECF system.

Dated this 15th day of September, 2017.

/s/ Victoria L. Neal
VICTORIA L. NEAL, ESQ.

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