

ALVERSON, TAYLOR, MORTENSEN & SANDERS
LAWYERS
6605 GRAND MONTECITO PKWY STE 200
LAS VEGAS, NV 89149
(702) 384-7000

1 J. BRUCE ALVERSON, ESQ.
Nevada Bar No. 1339
2 KARIE N. WILSON, ESQ.
Nevada Bar No. 7957
3 **ALVERSON TAYLOR**
MORTENSEN & SANDERS
4 6605 Grand Montecito Pkwy, Ste. 200
Las Vegas, NV 89149
5 702-384-7000 Phone
702-385-7000 Fax
6 Attorneys for Defendant
Kiewit Infrastructure West Co.
7

8 UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

10 CHAD KREISER, individually, CHRISTINA
LOU KRIESER

11 Plaintiffs,

12 v.

13 K & B STEEL, A DIVISION of WABB
INDUSTRIES, INC., a Texas Corporation;
14 KIEWIT WESTERN CO. d/b/a LAKE MEAD
CONSTRUCTORS, a Foreign Corporation;
15 DOES I through X; inclusive; and ROE
BUSINESS ENTITIES XI through XX,
16 inclusive

17 Defendants.

CASE NO: 2:16-cv-01361-MMF- CWH

**STIPULATION AND PROPOSED
ORDER TO ALLOW KIEWIT TO
FILE A SUPPLEMENTAL
MEMORANDUM TO ITS MOTION
TO DISMISS OR ALTERNATIVELY,
MOTION FOR SUMMARY
JUDGMENT AND TO EXTEND
DEADLINES RELATED THERETO
(Second Request)**

19 IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs, CHAD
20 KREISER and CHRISTINA LOU KREISER, Defendant, KIEWIT INFRASTRUCTURE WEST
21 CO., as successor through merger to KIEWIT WESTERN CO. d/b/a LAKE MEAD
22 CONSTRUCTORS (hereinafter “Kiewit”), and K & B STEEL, A DIVISION OF WABB
23 INDUSTRIES, INC., by and through their respective counsel of record, that Kiewit be permitted
24 to file a supplemental memorandum, including correcting the name and date of substantial

1 completion of the project at issue and submitting an additional supporting affidavit, to its Motion
2 to Dismiss or Alternatively, Motion for Summary Judgment, which was filed on May 11, 2018
3 (ECF No. 46). The proposed Supplemental Memorandum in Support of Defendant Kiewit
4 Infrastructure West Co.'s Motion to Dismiss or Alternatively, Motion for Summary Judgment is
5 attached hereto as Exhibit A.

6 IT IS FURTHER STIPULATED AND AGREED that the parties' responsive pleadings
7 shall be due on or before June 15, 2018 allow the parties sufficient time to oppose Kiewit's
8 motion and forthcoming Supplemental Memorandum on the merits.

9 This is the second stipulation for extension of time to extend deadlines regarding
10 Kiewit's Motion to Dismiss.

11 Dated this 30th day of May, 2018.

12 CHRISTIANSEN LAW OFFICES

KRING & CHUNG, LLP

13 /s/ Keely A. Perdue, Esq.

/s/ Robert L. Thompson, Esq.

14 By _____

By _____

14 PETER S. CHRISTIANSEN, ESQ.

ROBERT P. MOUGIN, ESQ.

15 Nevada Bar No. 5254

Nevada Bar No. 7104

15 R. TODD TERRY, ESQ.

ROBERT L. THOMPSON, ESQ.

16 Nevada Bar No. 6519

Nevada Bar No. 9920

16 KEELY A. PERDUE, ESQ.

1050 Indigo Drive

17 Nevada Bar No. 13872

Las Vegas, NV 89145

17 810 South Casino Center Blvd., Ste. 104

702-260-9500 Phone

18 Las Vegas, NV 89101

702-260-9434 Fax

18 702-240-7979 Phone

Attorneys for Defendant K & B Steel, a

19 866-412-6992 Fax

Division of Wabb Industries, Inc.

19 Attorneys for Plaintiffs

20 ...

21 ...

22 ...

23 ...

24 ...

1 ALVERSON, TAYLOR
MORTENSEN & SANDERS

2 /s/ Karie N. Wilson, Esq.

3 By _____
J. BRUCE ALVERSON, ESQ.

4 Nevada Bar No. 1339
KARIE N. WILSON, ESQ.
5 Nevada Bar No. 7957
6605 Grand Montecito Pkwy, Ste. 200
6 Las Vegas, NV 89149
702-384-7000 Phone
7 702-385-7000 Fax
8 *Attorneys for Defendant*
Kiewit Infrastructure West

9
10 **(PROPOSED) ORDER**

11 IT IS HEREBY ORDERED that Defendant, KIEWIT INFRASTRUCTURE WEST CO.,
12 as successor through merger to KIEWIT WESTERN CO. d/b/a LAKE MEAD
13 CONSTRUCTORS, be permitted to file a supplemental memorandum, including correcting the
14 name and date of substantial completion of the project at issue and submitting an additional
15 supporting affidavit, to its Motion to Dismiss or Alternatively, Motion for Summary Judgment,
16 which was filed on May 11, 2018 (ECF No. 46).

17 IT IS FURTHER ORDERED that the parties' responsive pleadings shall be due on or
18 before June 15, 2018 allow the parties sufficient time to oppose Kiewit's motion and
19 forthcoming Supplemental Memorandum on the merits.

20 Dated this 31st day of May, 2018.

21 

22 _____
U.S. DISTRICT COURT JUDGE