

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 KREISER, Individually,

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 TO EXTEND
DEADLINES REGARDING MOTION
TO DISMISS

(Third Request)

19 Plaintiffs, CHAD KREISER and CHRISTINA LOU KREISER, by and through their
20 counsel of record, Peter S. Christiansen, Esq., R. Todd Terry, Esq., and Keely A. Perdue, Esq. of
21 Christiansen Law Offices, and Defendant, KIEWIT INFRASTRUCTURE WEST CO. as
22 successor through merger to KIEWIT WESTERN CO. d/b/a LAKE MEAD CONSTRUCTORS
23 (hereinafter “Kiewit”), by and through its counsel of record, J. Bruce Alverson, Esq. and Karie
24 N. Wilson, Esq. of Alverson Taylor Mortensen & Sanders, and K & B STEEL, A DIVISION OF

1 WABB INDUSTRIES, INC., by and through its counsel of record, Robert P. Mouglin, Esq. and
2 Robert L. Thompson, Esq. of Kring & Chung, LLP, pursuant to LR IA 6-1(b) hereby stipulate
3 and agree to extend the deadlines associated with Defendant Kiewit Western Co. d/b/a Lake
4 Mead Constructor’s Motion to Dismiss or Alternatively, Motion for Summary Judgment
5 (“Motion”) filed on May 11, 2018 (Dkt. No. 46), as follows:

6 WHEREAS, Kiewit filed its motion on May 11, 2018;

7 WHEREAS, Plaintiffs’ opposition was filed on June 15, 2018;

8 WHEREAS, Kiewit’s reply brief is due on or before June 22, 2018; however, Kiewit
9 requires additional time to acquire prior pleadings and discovery in this matter and diligently
10 inquire as to the existence of records and documentation related to the facts and circumstances
11 alleged within Plaintiffs’ Amended Complaint.

12 IT IS STIPULATED AND AGREED that Kiewit’s reply brief shall be due on or before
13 June 29, 2018 to allow Kiewit sufficient time to reply to Plaintiffs’ opposition on its merits.

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1 This is the third stipulation for extension of time to extend deadlines regarding
2 Defendant's Motion to Dismiss.

3 This Stipulation is entered into this 20th day of June, 2018.

4 CHRISTIANSEN LAW OFFICES

KRING & CHUNG, LLP

5 /s/ Peter Christiansen

/s/ Robert Mouglin

6 By _____

By _____

7 PETER S. CHRISTIANSEN, ESQ.

ROBERT P. MOUGIN, ESQ.

8 Nevada Bar No. 5254

Nevada Bar No. 7104

9 R. TODD TERRY, ESQ.

ROBERT L. THOMPSON, ESQ.

10 Nevada Bar No. 6519

Nevada Bar No. 9920

11 KEELY A. PERDUE, ESQ.

1050 Indigo Drive

12 Nevada Bar No. 13872

Las Vegas, NV 89145

13 810 South Casino Center Blvd., Ste. 104

702-260-9500 Phone

14 Las Vegas, NV 89101

702-260-9434 Fax

15 702-240-7979 Phone

Attorneys for Defendant K & B Steel, a

16 866-412-6992 Fax

Division of Wabb Industries, Inc.

17 *Attorneys for Plaintiffs*

18 ALVERSON, TAYLOR

19 MORTENSEN & SANDERS

20 

21 By _____

22 J. BRUCE ALVERSON, ESQ.

23 Nevada Bar No. 1339

24 KARIE N. WILSON, ESQ.

Nevada Bar No. 7957

6605 Grand Montecito Pkwy, Ste. 200

Las Vegas, NV 89149

702-384-7000 Phone

702-385-7000 Fax

Attorneys for Defendant

Kiewit Infrastructure West Co.

ORDER

IT IS SO ORDERED.

DATED: June 25, 2018



UNITED STATES DISTRICT JUDGE