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6 Attorneys for Defendants Volkswagen Group of
America, Inc.

8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 DAVE CLEGG, an individual;
11 Plaintiff,

12 v.

13 VOLKSWAGEN GROUP OF AMERICA,
INC., a corporation; VOLKSWAGEN
AKTIENGESELLSCHAFT, a business
14 entity, form unknown; AND DOES 1
through 20, inclusive,
15 Defendants.

Case No.: 2:16-cv-01731-RFB-PAL

**STIPULATION AND PROPOSED ORDER
TO EXTEND TIME**

17 Defendant Volkswagen Group of America, Inc. (“VWGoA” or “Defendant”), by and
18 through its counsel of record, the law firm of Brownstein Hyatt Farber Schreck, LLP, and
19 Plaintiff Dave Clegg (“Plaintiff”), by and through the undersigned counsel of record, the law firm
20 of Hyde & Swigart, hereby stipulate and agree as follows:

21 In order to conserve the resources of the parties, their counsel and the judiciary, Defendant
22 shall have thirty (30) days to answer or otherwise respond to Plaintiff’s Complaint following
23 entry of this Court’s decision on Defendant’s Motion to Stay (ECF No. 4).

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Dated this 8th day of August, 2016.

BROWNSTEIN HYATT FARBER
SCHRECK, LLP

By: /s/ Jeffrey S. Rugg
JEFFREY S. RUGG, ESQ.
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Attorneys for Defendants Volkswagen Group
of America, Inc.

Dated this 8th day of August, 2016.

HYDE & SWIGART

By: /s/ Sara Khosroabadi
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Las Vegas, NV 89117
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Attorneys for Plaintiff Dave Clegg

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: August 9, 2016

CERTIFICATE OF SERVICE

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Pursuant to Fed.R.Civ.P.5(b), and Section IV of District of Nevada Electronic Filing Procedures, I certify that I am an employee of BROWNSTEIN HYATT FARBER SCHRECK, LLP, and that the foregoing **STIPULATION AND PROPOSED ORDER TO EXTEND TIME** was served via electronic service on the 8th day of August, 2016 and to the addresses shown below:

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/s/ Karen Wiehl

An employee of Brownstein Hyatt Farber Schreck, LLP