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JEFFREY S. RUGG, ESQ., Bar No. 10978 1 jrugg@bhfs.com BENJAMIN K. REITZ, ESQ., Bar No. 13233 2 breitz@bhfs.com BROWNSTEIN HYATT FARBER SCHRECK, LLP 3 100 North City Parkway, Suite 1600 Las Vegas, NV 89106-4614 4 Telephone: 702.382.2101 Facsimile: 702.382.8135 5 Attorneys for Defendants Volkswagen Group of 6 America, Inc. 7 UNITED STATES DISTRICT COURT 8 DISTRICT OF NEVADA 9 10 TIMOTHY LEWIS, an individual; Case No.: 2:16-cv-01732-APG-VCF STIPULATION AND PROPOSED ORDER 11 Plaintiff, TO EXTEND TIME v. 12 VOLKSWAGEN GROUP OF AMERICA, 13 INC., a corporation; VOLKSWAGEN AKTIENGESELLSCHAFT, a business 14 entity, form unknown; AND DOES 1 through 20, inclusive, 15 Defendants. 16 Defendant Volkswagen Group of America, Inc. ("VWGoA" or "Defendant"), by and 17 through its counsel of record, the law firm of Brownstein Hyatt Farber Schreck, LLP, and 18 Plaintiff Timothy Lewis ("Plaintiff"), by and through the undersigned counsel of record, the law 19 firm of Hyde & Swigart, hereby stipulate and agree as follows: 20 In order to conserve the resources of the parties, their counsel and the judiciary, Defendant 21 shall have thirty (30) days to answer or otherwise respond to Plaintiff's Complaint following 22 entry of this Court's decision on Defendant's Motion to Stay (ECF No. 5). 23 24 25 26 27 28

1	Dated this 8th day of August, 2016.	Dated this 8th day of August, 2016.
2	BROWNSTEIN HYATT FARBER SCHRECK, LLP	HYDE & SWIGART
4 5 6 7 8 9 10 11	By: /s/ Jeffrey S. Rugg JEFFREY S. RUGG, ESQ. BENJAMIN K. REITZ, ESQ., 100 North City Parkway, Suite 1600 Las Vegas, NV 89106-4614 Telephone: 702.382.2101 Facsimile: 702.382.8135 Attorneys for Defendants Volkswagen Group of America, Inc.	By: /s/ Sara Khosroabadi SARA KHOSROABADI, ESQ. 7854 W. Sahara Ave. Las Vegas, NV 89117 Telephone: (619) 223-7770 Facsimile: (619) 297-1022 Attorneys for Plaintiff Timothy Lewis
11 12 13 14 15 16 17 18 19 20 21	IT IS HEREBY ORDERED that a status heari is scheduled for 11:00 a.m., November 7, 2016 in courtroom 3D.	~ II IC CO ORDERED.
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CERTIFICATE OF SERVICE

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:
SARA KHOSROABADI, ESQ. sara@westcoastlitigation.com HYDE & SWIGART 7854 W. Sahara Ave. Las Vegas, NV 89117 Telephone: (619) 223-7770 Facsimile: (619) 297-1022 Attorneys for Plaintiff Timothy Lewis

/s/ Karen Wiehl	
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An employee of Brownstein Hyatt Farber Schreck, LLP