

1 GARG GOLDEN LAW FIRM  
 ANTHONY B. GOLDEN, ESQ.  
 2 Nevada Bar No. 9563  
 MARGARET G. FOLEY, ESQ.  
 3 Nevada Bar No. 7703  
 3185 St. Rose Parkway, Suite 325  
 4 Henderson, Nevada 89052  
 Tel: (702) 850-0202  
 5 Fax: (702) 850-0204  
 Email: agolden@garggolden.com  
 6 Email: mfoley@garggolden.com

7 Counsel for Defendant Omni Limousine

8  
 9  
 10 UNITED STATES DISTRICT COURT  
 11 DISTRICT OF NEVADA

12 RONALD KEEN, ET AL.,

13 Plaintiffs,

14 vs.

15 OMNI LIMOUSINE,

16 Defendant.

CASE NO.: 2:16-cv-01903-JCM-GWF

**STIPULATION AND ~~PROPOSED~~  
 ORDER TO EXTEND DEADLINES TO  
 RESPOND TO MOTION TO LIFT STAY  
 (ECF No. 27) and MOTION FOR  
 BRIEFING SCHEDULE RE MOTION  
 FOR CIRCULATION OF NOTICE (ECF  
 No. 28)**

**(First Request)**

17  
 18  
 19 Plaintiffs, by and through their counsel of record, Thierman Buck, LLP, and Defendant, by  
 20 and through its counsel of record, the Garg Golden Law Firm, hereby stipulate and agree as  
 21 follows:

- 22 1. To an extension of Defendant’s deadline to respond to Plaintiffs’ Motion to Lift  
 23 Stay (ECF No. 27) from April 7, 2017, to April 21, 2017; and  
 24 2. To an extension of Defendant’s deadline to respond to Plaintiffs’ Motion for  
 25 Briefing Schedule re Motion for Circulation of Notice (ECF No. 28) from April 7, 2017, to April  
 26 21, 2017.

27 On March 30, 2017, Plaintiffs filed their Motion to Lift Stay (ECF No. 27) and Motion for  
 28 Briefing Schedule re Motion for Circulation of Notice (ECF No. 28). On March 31, 2017, the

1 Court ordered Defendant to file any opposition to the foregoing motions no later than April 7, 2017  
2 (ECF. No. 30). Since the Court's Order, the parties have engaged in good faith discussions, through  
3 their counsel, to submit this case and the related case, McSwiggin v. Omni Limousine, Case No  
4 2:14-cv-02172-JCM-NJK, to mediation. Accordingly, the parties wish to dedicate time and  
5 financial resources toward that end. The parties anticipate reaching an agreement on submitting  
6 the cases to mediation within 14 days of today and, therefore, request that the Court extend  
7 Defendant's opposition deadline on the respective motions 14 days from today to April 21, 2017.  
8 Provided the parties reach an agreement regarding mediation in that time, they will submit to the  
9 Court a further stipulation regarding the stay.

10 This stipulation is not made for the purposes of delay but to allow the parties sufficient  
11 time to reach an agreement on a mediator and to initiate the mediation process. This is the first  
12 request for an extension of these deadlines.

13 DATED this 7<sup>th</sup> day of April, 2017.

DATED this 7<sup>th</sup> day of April, 2017

14 GARG GOLDEN LAW FIRM

THIERMAN BUCK, LLP

15 By /s/ Anthony B. Golden  
16 Anthony B. Golden, Esq.  
17 Margaret G. Foley, Esq.  
18 3185 St. Rose Parkway, Suite 325  
19 Henderson, Nevada 89052  
20 (702) 850-0202

By /s/ Joshua D. Buck  
Joshua D. Buck, Esq.  
Mark R. Thierman, Esq.  
Joshua R. Hendrickson, Esq.  
7287 Lakeside Drive  
Reno, Nevada 89511

Counsel for Defendant

Counsel for Plaintiffs

21 **ORDER**

22 IT IS SO ORDERED:

23  
24   
25 UNITED STATES MAGISTRATE JUDGE

26  
27 DATED: April 10, 2017