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7 Keolis Transit America and
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9
10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 MANUEL VERMA, an individual, DUANE
13 USHIJIMA, an individual,

14 Plaintiffs,

15 vs.

16 KEOLIS TRANSIT AMERICA, LLC;
DOES 1 through 10 inclusive; ROES
17 CORPORATIONS/ENTITIES 1 through 10
inclusive; and REGIONAL
18 TRANSPORTATION COMMISSION OF
SOUTHERN NEVADA; DOES 1 through
19 10 inclusive; ROES
CORPORATIONS/ENTITIES 1 through 10
20 inclusive,,

21 Defendants.

Case No. 2:16-cv-02037-JAD-NJK

22
23 **STIPULATION AND ORDER TO**
CONTINUE HEARING ON
DEFENDANTS' MOTION TO DISMISS

(First Request)

24 The parties, by and through their respective counsel, hereby stipulate and agree to continue
25 the hearing on Defendants' Motion to Dismiss (ECF No. 13) currently set for December 12, 2016
at 2:30 pm to ~~December 29, 2016~~, or thereafter as the Court's calendar permits. *

26 The parties further stipulate and agree that Defendants shall have to and including December
27 5, 2016 within which to file a Reply in Support of its Motion to Dismiss.

1 This request is prompted by defense counsel's scheduling conflict. Defense counsel needs
2 additional time to review the Plaintiff's opposition to its motion because of counsel's involvement
3 in two representation cases filed with the National Labor Relations Board in the past two weeks.

4 It is necessary to continue the oral argument because Defense counsel will be handling an
5 unfair labor practice trial before the National Labor Relations Board in the matter entitled Jose
6 Escoto and Stratosphere Gaming, LLC which is expected to take two days.

7 This stipulation and order is sought in good faith and not for the purpose of delay.

8 DATED: November 18, 2016.

9 THE THATER LAW GROUP, P.C.

JACKSON LEWIS P.C.

11 /s/ M. Lani Esteban-Trinidad
12 M. Lani Esteban-Trinidad, Bar #6967
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14 Las Vegas, Nevada 89108

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16 Attorney for Defendants
17 Keolis Transit America, LLC and
18 Regional Transportation Commission of
19 Southern Nevada

20 **ORDER**

21 IT IS SO ORDERED.

22 
23 _____
24 U.S. District/Magistrate Judge

25 DATED: 11/21/2016

26 *IT IS ORDERED that the motion hearing RE [13] Motion to Dismiss is RESET for
27 1/4/2017 at 2:00 PM.
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