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11 *Attorneys for Defendant*

12 UNITED STATES DISTRICT COURT
 13 DISTRICT OF NEVADA

14
 15 KEN KACHUR,

16 Plaintiff,

17 vs.

18 NAV-LVH, LLC dba WESTGATE LAS
 19 VEGAS RESORT & CASINO, a Nevada,
 20 Limited Liability Company,

21 Defendant.

Case No.: 2:16-cv-02899

22 **STIPULATION AND REQUEST TO
 23 EXTEND DISPOSITIVE MOTIONS
 24 DEADLINE**

25 **(FIRST REQUEST)**

26 ECF No. 37

27 COME NOW, Defendant, named above, by and through its attorneys of record, MYRNA
 28 L. MAYSONET, ESQ. and PHILLIP A. SILVESTRI, ESQ., and Plaintiff, by and through his
 counsel of record, MICHAEL P. BALABAN, ESQ., pursuant to Local Rule IA 6-1, and herein
 stipulate, agree and make joint application to extend the dispositive motions date, for a period of
 three (3) weeks, up to and including December 10, 2018. The present dispositive motions
 deadline is November 16, 2018.

This is the first stipulation for an extension of time for the Defendant to file its Motion

1 for Summary Judgement. This stipulation is made and based upon the following factors:

2 Counsel for both Plaintiff and Defendant have several matters pending before this Court,
3 and have been engaged in ongoing discovery and briefing. Discovery on this case only recently
4 was completed, and certain medical records were only recently received. The additional time will
5 allow both parties the opportunity to thoroughly review the medical records and incorporate any
6 pertinent information into their respective dispositive motions (if any are filed).

7 Based on the foregoing, the parties request that this Court order that the time for the
8 dispositive motions be extended three (3) weeks, up to and including, December 10, 2018.

9 Dated: November 15, 2018

Dated: November 15, 2018

10 LAW OFFICES OF MICHAEL P. BALABAN

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18 IT IS SO ORDERED

19 
20 _____
UNITED STATES DISTRICT JUDGE

21 DATED: 11-18-18

22 nunc pro tunc to 11-16-18