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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

**STIPULATION AND [PROPOSED]
 ORDER TO EXTEND DISPOSITIVE
 MOTIONS DEADLINE**

(SECOND REQUEST)

22 COME NOW, Defendant, named above, by and through its attorneys of record, MYRNA
 23 L. MAYSONET, ESQ. and PHILLIP A. SILVESTRI, ESQ., and Plaintiff, by and through his
 24 counsel of record, MICHAEL P. BALABAN, ESQ., pursuant to Local Rule IA 6-1, and herein
 25 stipulate, agree and make joint application to extend the dispositive motions date, for a period of
 26 four (4) days, up to and including December 14, 2018. The present dispositive motions deadline is
 27 December 10, 2018.

28 This is the second 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. Counsel is diligently working to
4 complete a joint pretrial memorandum in one of these matters concurrently with preparing
5 dispositive motions in this matter. While the parties have been working diligently, a short
6 continuance is necessary to allow the parties to complete their dispositive motions.

7 Based on the foregoing, the parties request that this Court order that the time for the
8 dispositive motions be extended four (4) days, up to and including, December 14, 2018.

9 Dated: December 6, 2018

Dated: December 6, 2018

10 LAW OFFICES OF MICHAEL P. BALABAN

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18 IT IS SO ORDERED

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20 _____
21 UNITED STATES MAGISTRATE JUDGE

22 DATED: December 7, 2018
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