

1 **DLA PIPER LLP**
 2 Mary C. Dollarhide, *admitted pro hac vice*
 3 4365 Executive Drive, Suite 1100
 4 San Diego, CA 82121
 5 Tel, (858) 677-1429
 6 Fax (858) 638-5119
 7 Mary.dollarhide@us.dlapiper.com

8 **OGLETREE, DEAKINS, NASH, SMOAK, &**
 9 **STEWART, PC.**
 10 Molly M. Rezac, Nev. Bar No. 7435
 11 50 West Liberty Street, Suite 920
 12 Reno, Nevada 89501
 13 Tel. (775) 440-2372
 14 Fax (775) 440-2376
 15 molly.rezac@ogletreedeakins.com

16 *Attorneys for Defendant The Venetian Casino Resort, LLC*

17 **THIERMAN BUCK, LLP**
 18 Mark R. Thierman, Esq., Bar No. 8285
 19 Joshua D. Buck, Esq., Bar No. 12187
 20 Leah L. Jones, Esq., Bar No. .13161
 21 7287 Lakeside Drive
 22 Reno, Nevada 89511
 23 Tel. (775) 284-1500
 24 Fax (775) 703-5027
 25 josh@thiermanbuck.com
 26 mark@thiermanbuck.com
 27 leah@thiermanbuck.com

28 *Attorneys for Plaintiffs Yousif and Walker*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MUSTAFA YOUSIF and SHARONE WALKER)
 on behalf of themselves and all others similarly)
 situated,)

Plaintiffs,)

v.)

THE VENETIAN CASINO RESORT, LLC;)
 LAS VEGAS SANDS, CORP and DOES 1)
 through 50, inclusive,)

Defendants.)

CASE NO. 2:16-cv-02941-RFB-NJK

JOINT STIPULATION AND
[PROPOSED] ORDER REGARDING
BRIEFING SCHEDULE ON
PLAINTIFFS' MOTION FOR
PROTECIVE ORDER

1 Pursuant to this Court’s Order to stay this action pending mediation, the parties hereby
2 submit the following briefing schedule and stipulate to other related dates herein.

3 As previously reported to the Court, the Parties attended mediation on November 21, 2019,
4 but were unable to reach a settlement agreement on that date. The Parties agreed to attend a
5 second mediation on February 28, 2020. In the meantime, further case assessment was conducted
6 and the second day of mediation was ultimately cancelled. Having met and conferred, the parties
7 now jointly request the following briefing schedule with respect to the Parties’ ongoing discovery
8 dispute and Plaintiffs’ previously filed motion for protective order:

- 9 • **February 21:** Plaintiffs to re-file protective order motion related to opt-in discovery
10 propounded on conditionally certified 216(b) collective.
- 11 • **March 20:** Defendant to respond to re-filed motion for protective order.
- 12 • **April 3:** Plaintiffs to file reply on motion for protective order.

13 Resolution of this discovery dispute will dictate the need for additional motion practice in this case
14 and the timing of such motion(s). As a result, the Parties believe that resolution of Plaintiffs’
15 motion for a protective order will provide clarity on future dates so that the Parties will be in a
16 better position to propose additional briefing on those motions. Therefore, the Parties further
17 stipulate that Plaintiffs will withdraw their pending Rule 23 class certification motion and the
18 Parties will submit a joint briefing schedule on any future Rule 23 motion (and other potential
19 motions) no later than 14 days following the Court’s final resolution on Plaintiffs’ motion for
20 protective order.

21 This Stipulation is made in good faith and not for the purposes of undue burden or delay.

22 **IT IS SO STIPULATED:**

23 Dated this 10th day of February, 2020.
24 THIERMAN BUCK, LLP

Dated this 10th day of February, 2020.
DLA PIPER LLP

25 /s/Joshua D. Buck
26 Mark R. Thierman, Esq., Bar No. 8285
27 Joshua D. Buck, Esq., Bar No. 12187
28 Leah L. Jones, Esq., Bar No. .13161
7287 Lakeside Drive
Reno, Nevada 89511

/s/Mary C. Dollarhide
Mary C. Dollarhide, *admitted pro hac vice*
4365 Executive Drive, Suite 1100
San Diego, CA 82121
OGLETREE, DEAKINS, NASH, SMOAK, &

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Attorneys for Plaintiffs

STEWART, P.C.
/s/Molly M. Rezac
Molly M. Rezac, Nev. Bar No. 7435
50 West Liberty Street, Suite 920
Reno, Nevada 89501


Attorneys for Defendant

ORDER

IT IS HEREBY ORDERED that the Parties' Stipulation and Briefing Schedule on Plaintiffs' motion for protective order is **GRANTED**.

IT IS FURTHER ORDERED that the Parties will submit a Joint Status Report and Proposed Briefing Schedule no later than 14 days following final resolution of Plaintiffs' motion for protective order.

IT IS SO ORDERED:



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED this 11th day of February , 2020.