1	Elayna J. Youchah Nevada State Bar No. 5837		
2	Mahna Pourshaban Nevada State Bar No. 13743  JACKSON LEWIS P.C. 3800 Howard Hughes Pkwy, Suite 600 Las Vegas, Nevada 89169 Tel: (702) 921-2460 Email: youchahe@jacksonlewis.com Email: mahna.pourshaban@jacksonlewis.com		
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7	Attorneys for Defendants Bocci Engineering, LLC and Employers One Source Group Inc.		
8	Employers One Source Group, Inc.		
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10	UNITED STATES DISTRICT COURT		
11	DISTRICT OF NEVADA		
12	AJULENA BARNES,	Case No. 2:17-cv-00101-APG-PAL	
13	Plaintiff,		
14	vs.	EMERGENCY REQUEST AND STIPULATION AND ORDER TO	
15	BOCCI ENGINEERING, LLC, a limited liability company; EMPLOYERS ONE	CONTINUE EARLY NEUTRAL EVALUATION S ESSION	
16	SOURCE GROUP, INC., a foreign corporation; AND DOES 1-50, inclusive,	(SECOND REQUEST)	
17	Defendants.		
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19	Due to unforeseen circumstances arising from Hurricane Harvey and the impact it has had		
20	on Defendants' ENE participants, the parties spoke and have agreed to stipulate to continue the		
21	Early Neutral Evaluation ("ENE") Session currently scheduled for September 13, 2017 at 9:00 a.m.,		
22	before the Honorable Magistrate Judge George Foley, Jr.		
23	Specifically, this request is prompted by the effects of the catastrophic hurricane that hit the		
24	southeastern part of Texas on or around August 25, 2017. Defendant BOCCI Engineering LLC's		
25	Chief Executive Officer, Lianne Lami resides in Houston, Texas and was one of millions effected		
26	by this unprecedented natural disaster. As such, Ms. Lami is temporarily unable to travel from		
27	Houston to Las Vegas to attend the ENE as her home has sustained immeasurable damages. The		
28	Parties therefore respectfully request the ENE scheduled for September 13, 2017 be vacated, and		

1	that a new ENE date be set for October 19, 2017 at 9:30 a.m., or as soon thereafter as the Court	
2	calendar will allow.	
3	This stipulation and order is sought is good faith and not for the purpose of delay.	
4	Dated this 5th day of September, 2017.	
5	WATKINS & LETOFSKY, LLP	JACKSON LEWIS P.C.
6		
7	/s/ Daniel R. Watkins Daniel R. Watkins, Bar #11881	/s/ Mahna Pourshaban Elayna J. Youchah, Bar #5837
8	Amy E. Buchanan, Bar #13312 8215 S. Eastern Ave., Ste. 265 Las Vegas, Nevada 89123	Mahna Pourshaban, Bar #13743
9		3800 Howard Hughes Parkway, Ste. 600 Las Vegas, Nevada 89169
10	Attorneys for Plaintiff Ajulena Barnes	Attorneys for Defendants
11		Bocci Engineering, LLC and Employers One Source Group, Inc.
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13	ORDER	
14	IT IS SO ORDERED:  UNITED STATES MAGISTRATE JUDGE  Dated: September 5, 2017	
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