

BAILEY ❖ KENNEDY
8984 SPANISH RIDGE AVENUE
LAS VEGAS, NEVADA 89148-1302
702.562.8820

1 JOHN R. BAILEY
Nevada Bar No. 0137
2 DENNIS L. KENNEDY
Nevada Bar No. 1462
3 JOSHUA P. GILMORE
Nevada Bar No. 11576
4 PAUL C. WILLIAMS
Nevada Bar No. 12524
5 STEPHANIE J. GLANTZ
Nevada Bar No. 14878
6 **BAILEY ❖ KENNEDY**
8984 Spanish Ridge Avenue
7 Las Vegas, Nevada 89148-1302
Telephone: 702.562.8820
8 Facsimile: 702.562.8821
JBailey@BaileyKennedy.com
9 DKennedy@BaileyKennedy.com
JGilmore@BaileyKennedy.com
10 PWilliams@BaileyKennedy.com
SGlantz@BaileyKennedy.com

11 *Attorneys for Plaintiff/Counterdefendants*
12 *TPOV Enterprises, LLC, TPOV Enterprises 16, LLC,*
13 *and Rowen Seibel*

14 UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

15 TPOV ENTERPRISES 16, LLC, a Delaware
limited liability company,

16 Plaintiff,

17 vs.

18 PARIS LAS VEGAS OPERATING COMPANY,
LLC, a Nevada limited liability company,

19 Defendant.

20
21 PARIS LAS VEGAS OPERATING COMPANY,
LLC, a Nevada limited liability company,

22 Counterclaimant,

23 vs.

24 TPOV ENTERPRISES, LLC, a Delaware limited
liability company, TPOV ENTERPRISES 16,
25 LLC, a Delaware limited liability company,
ROWEN SEIBEL, an individual,

26 Counterdefendants.
27

Case No. 2:17-cv-00346-JCM-VCF

**STIPULATION AND ORDER
EXTENDING DEADLINE FOR OBJECTION
TO REPORT AND RECOMMENDATION
AND ORDER [ECF No. 194]**

(FIRST REQUEST)

28

1 Pursuant to LR IA 6-1, Plaintiff/Counterdefendant TPOV Enterprises 16, LLC (“TPOV
2 16”); Counterdefendant TPOV Enterprises, LLC (“TPOV”); Counterdefendant Rowen Seibel
3 (“Seibel”); and Defendant/Counterclaimant Paris Las Vegas Operating Company, LLC (“Paris”)
4 (collectively, the “Parties”) stipulate and agree as follows:

5 1. On October 15, 2019, Paris filed a Motion for Terminating Sanctions, seeking case-
6 terminating sanctions against TPOV 16, TPOV, and Seibel. (ECF Nos. 152 and 153.)

7 2. On February 19, 2020, United States Magistrate Judge Cam Ferenbach entered a
8 Report and Recommendation and Order (the “Report and Recommendation”). (ECF No. 194.)

9 3. In the Report and Recommendation, the Magistrate Judge recommended that Paris’
10 Motion for Terminating Sanctions be granted, in part; specifically, recommending that the Answer
11 filed by TPOV 16, TPOV, and Seibel (ECF No. 40) be stricken as to TPOV only (i.e., not as to
12 TPOV 16 and Seibel). (ECF No. 194, at 13:5-8.)

13 4. On March 2, 2020, TPOV 16, TPOV, and Seibel filed a motion seeking to replace
14 their counsel with the law firm of Bailey❖Kennedy. (ECF No. 195.) That afternoon, the Court
15 granted TPOV 16, TPOV, and Seibel’s application for Bailey❖Kennedy to substitute in as their
16 counsel. (ECF No. 196.)

17 5. Currently, the deadline to file an objection to the Report and Recommendation is
18 tomorrow, March 4, 2020. *See* LR IB 3-2(a).

19 6. The deadline to file an objection to the Report and Recommendation shall be
20 extended by seven (7) days to March 11, 2020.

21 7. Good cause exists to extend the deadline to file an objection to the Report and
22 Recommendation to March 11, 2020. Recently engaged counsel for TPOV 16, TPOV, and Seibel
23 needs sufficient time to acclimate themselves with the matter (including the issues related to the
24 Motion for Terminating Sanctions) in order to submit an objection to the Report and
25 Recommendations, which, from their perspective, is particularly true given that the Magistrate
26 Judge’s recommended sanction is a case-terminating sanction as to TPOV.

1 8. This is the first request to extend time, is made in good faith, and will not impact any
2 other deadlines.

3 Dated this 3rd day of March, 2020.

Dated this 3rd day of March, 2020.

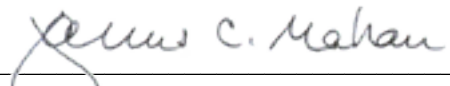
4 BAILEY ❖ KENNEDY

PISANELLI BICE PLLC

5 By: /s/ Paul C. Williams
6 JOHN R. BAILEY
7 DENNIS L. KENNEDY
8 JOSHUA P. GILMORE
9 PAUL C. WILLIAMS
10 STEPHANIE J. GLANTZ
11 Attorneys for Plaintiff/Counterdefendants
12 TPOV Enterprises, LLC, TPOV Enterprises
13 16, LLC, and Rowen Seibel

By: /s/ M. Magali Mercera
JAMES J. PISANELLI
DEBRA L. SPINELLI
M. MAGALI MERCERA
BRITTNE T. WATKINS
400 South 7th Street, Suite 300
Las Vegas, Nevada 89101
JJP@pisanellibice.com
DLK@pisanellibice.com
MMM@pisanellibice.com
BTW@pisanellibice.com
Attorneys for Defendant/Counterclaimant
Paris Las Vegas Operating Company, LLC

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE

DATED: March 4, 2020

19 Respectfully submitted by:

20 BAILEY ❖ KENNEDY

21 By: /s/ Paul C. Williams
22 JOHN R. BAILEY
23 DENNIS L. KENNEDY
24 JOSHUA P. GILMORE
25 PAUL C. WILLIAMS
26 STEPHANIE J. GLANTZ
27 Attorneys for Plaintiff/Counterdefendants
28 TPOV Enterprises, LLC, TPOV Enterprises 16, LLC,
and Rowen Seibel