

PISANELLIBICE PLLC
400 SOUTH 7TH STREET, SUITE 300
LAS VEGAS, NEVADA 89101

1 James J. Pisanelli, Esq., Bar No. 4027
JJP@pisanellibice.com
2 Debra L. Spinelli, Esq., Bar No. 9695
DLS@pisanellibice.com
3 M. Magali Mercera, Esq., Bar No. 11742
MMM@pisanellibice.com
4 Brittnie T. Watkins, Esq., Bar No. 13612
BTW@pisanellibice.com
5 PISANELLI BICE PLLC
400 South 7th Street, Suite 300
6 Las Vegas, Nevada 89101
Telephone: 702.214.2100
7 Facsimile: 702.214.2101

8 *Attorneys for Paris Las Vegas Operating Company, LLC*

9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 TPOV ENTERPRISES 16, LLC, a Delaware
Limited Liability Company,
12
13 Plaintiff,
14 vs.
15 PARIS LAS VEGAS OPERATING
COMPANY, LLC, a Nevada limited liability
company,
16 Defendant.

CASE NO. 2:17-cv-00346-JCM-VCF

**STIPULATION AND
ORDER TO EXTEND DEADLINE TO
FILE RESPONSE TO OBJECTION TO
REPORT AND RECOMMENDATIONS
(ECF NO. 200)**

17 PARIS LAS VEGAS OPERATING
COMPANY, LLC, a Nevada limited liability
company,
18
19 Counterclaimant.
20 vs.
21 TPOV ENTERPRISES, LLC, a Delaware
Limited Liability Company, TPOV
22 ENTERPRISES 16, LLC, a Delaware Limited
Liability Company, ROWEN SEIBEL, an
individual.
23
24 Counter-defendants.

25
26 Plaintiff/Counterdefendants TPOV Enterprises 16, LLC ("TPOV 16"), TPOV Enterprises,
27 LLC ("TPOV"), and Rowen Seibel ("Seibel") (collectively, the "Plaintiff/Counterdefendants") and
28

1 Defendant/Counterclaimant Paris Las Vegas Operating Company, LLC ("Paris") (collectively, the
2 "Parties") by and through their undersigned counsel of record, stipulate and agree as follows:

3 1. On October 15, 2019, Paris filed a Motion for Terminating Sanctions, seeking case-
4 terminating sanctions against Plaintiff/Counterdefendants. (ECF Nos. 152 and 153.)

5 2. On February 19, 2020, United States Magistrate Judge Cam Ferenbach entered a
6 Report and Recommendation and Order (the "Report and Recommendation"). (ECF No. 194.)

7 3. In the Report and Recommendation, the Magistrate Judge recommended that Paris'
8 Motion for Terminating Sanctions be granted, in part; specifically, recommending that the Answer
9 filed by Plaintiff/Counterdefendants (ECF No. 40) be stricken as to TPOV only. (ECF No. 194, at
10 13:5-8.)

11 4. On March 3, 2020, the Parties submitted a stipulation seeking to extend the deadline
12 for Plaintiff/Counterdefendants to file an objection to the Report and Recommendations.

13 5. The Court granted the Parties' stipulation on March 4, 2020 and
14 Plaintiff/Counterdefendants filed an Objection to the Report and Recommendations (ECF Nos. 200,
15 201) on March 11, 2020 (the "Objection").

16 6. Accordingly, pursuant to LR IB 3-2(a), the deadline to file a response to the
17 Objection is, March 25, 2020.

18 7. The deadline to file a response to the Objection shall be extended by seven (7) days
19 to April 1, 2020.

20 8. Good cause exists to extend the deadline to file a response to the Objection. Due to
21 the shift in working conditions occurring in light of the current COVID-19 crisis, additional time is
22 needed to complete the response to the Objection.

23 9. This is the first stipulation for extension of time to file the response to the Objection
24 and will not impact any other deadlines.

25 ///

26
27
28

PISANELLIBICE PLLC
400 SOUTH 7TH STREET, SUITE 300
LAS VEGAS, NEVADA 89101

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

10. This stipulation is made in good faith and not for purposes of delay.

DATED this 25th day of March 2020.

DATED this 25th day of March 2020.

PISANELLI BICE PLLC

BAILEY ♦ KENNEDY

By: /s/ M. Magali Mercera
James J. Pisanelli, Esq., Bar No. 4027
Debra L. Spinelli, Esq., Bar No. 9695
M. Magali Mercera, Esq., Bar No. 11742
Brittanie T. Watkins, Esq., Bar No. 13612
400 South 7th Street, Suite 300
Las Vegas, Nevada 89101

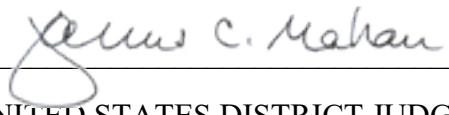
By: /s/ Paul C. Williams
John R. Bailey, Esq., Bar No. 0137
Dennis L. Kennedy, Esq., Bar No. 1462
Joshua P. Gilmore, Esq., Bar No. 11576
Paul C. Williams, Esq., Bar No. 12524
Stephanie J. Glantz, Esq., Bar No. 14878
8984 Spanish Ridge Avenue
Las Vegas, Nevada 89148-1302

*Attorneys for Paris Las Vegas Operating
Company, LLC*

*Attorneys for TPOV Enterprises 16, LLC,
TPOV Enterprises, LLC and Rowen Seibel*

ORDER

IT IS SO ORDERED.



UNITED STATES DISTRICT JUDGE

DATED: April 3, 2020