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   and Rowen Seibel

13   UNITED STATES DISTRICT COURT
14   DISTRICT OF NEVADA

15 TPOV ENTERPRISES 16, LLC, a Delaware   Case No. 2:17-cv-00346-JCM-VCF
   limited liability company,
16
                        Plaintiff,
17   vs.   **STIPULATION AND ORDER STAYING**
                                                 BRIEFING ON PLAINTIFF/
18 PARIS LAS VEGAS OPERATING COMPANY,   **COUNTERDEFENDANTS' MOTION TO**
   LLC, a Nevada limited liability company,   **EXTEND DISCOVERY DEADLINES**
19   **[ECF NO. 224]**
                        Defendant.
20 _____

21 PARIS LAS VEGAS OPERATING COMPANY,
   LLC, a Nevada limited liability company,   **(FIRST REQUEST)**
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

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                           Page **1** of **3**

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702.562.8820

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") (collectively, "Seibel and the TPOV Entities"); and Defendant/Counterclaimant Paris

4 Las Vegas Operating Company, LLC ("Paris") (collectively, the "Parties") stipulate and agree as

5 follows:

6   1. On May 29, 2020, Seibel and the TPOV Entities filed a Motion to Extend Discovery

7 Deadlines (the "Motion to Extend"). (ECF No. 224.)

8   2. Currently, the deadline to file a response to the Motion to Extend is June 12, 2020.

9   3. On June 10, 2020, the court in the related lawsuit styled *Seibel v. PHWLV, LLC*, *et*

10 *al.*, Case No. A-17-751759-B, currently pending before the Eighth Judicial District Court of the

11 State of Nevada (the "State Court Matter"), orally granted, in part, a similar motion to extend

12 certain discovery deadlines in the State Court Matter.

13   4. The Parties have agreed that discovery in this matter will proceed simultaneously

14 with discovery conducted in the State Court Matter and thus anticipate filing a stipulation and

15 proposed order to address the discovery deadlines in this matter—which would render the Motion

16 to Extend moot—promptly following entry of an order extending the discovery deadlines in the

17 State Court Matter.

18   5. Accordingly, the Parties have agreed that, briefing shall be stayed on the Motion to

19 Extend while the Parties finalize a stipulation and proposed order to address the discovery schedule

20 in this matter in line with the schedule to be entered in the State Court Matter.

21   6. Good cause exists to stay briefing on the Motion to Extend as it will be unnecessary

22 for the Court to rule upon the Motion to Extend following entry of a new discovery schedule as

23 agreed by the Parties. In an effort to conserve judicial resources, the Parties respectfully request

24 that this Court stay briefing on the Motion to Extend.

25 / / /

26 / / /

27 / / /

28 / / /

1   7.   This is the first request to stay briefing on the Motion to Extend and is made in good

2 faith and not for the purpose of delay.

3 Dated this 12th day of June, 2020.   Dated this 12th day of June, 2020.

4 BAILEY❖KENNEDY   PISANELLI BICE PLLC

5 By: /s/ Paul C. Williams   By: /s/ M. Magali Mercera

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                                  MMM@pisanellibice.com

10   BTW@pisanellibice.com

11   *Attorneys for Defendant/Counterclaimant*

                         Paris Las Vegas Operating Company, LLC

12

13

14   IT IS SO ORDERED.

15

16   _____

17   UNITED STATES MAGISTRATE JUDGE

                          6-17-2020

18   DATED:_____

19

20 Respectfully submitted by:

21 BAILEY❖KENNEDY

22 By: /s/ Paul C. Williams

       JOHN R. BAILEY

23   DENNIS L. KENNEDY

       JOSHUA P. GILMORE

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