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7 *Operating Company, LLC*

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

10 TPOV ENTERPRISES 16, LLC, a Delaware
Limited Liability Company,

11 Plaintiff,

12 vs.

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

15 Defendant.

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

**STIPULATION AND ~~PROPOSED~~ ORDER
EXTENDING DEADLINE TO FILE
REPLY IN SUPPORT OF
COUNTERMOTION FOR PROTECTIVE
ORDER**

(FIRST REQUEST)

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

19 Counterclaimant.

20 vs.

21 TPOV ENTERPRISES, LLC, a Delaware
Limited Liability Company, TPOV
22 ENTERPRISES 16, LLC, a Delaware Limited
Liability Company, Rowen Siebel, an
23 individual.

24 Counter-defendants.

25
26 Pursuant to LR IA 6-1, Plaintiff/Counterdefendant TPOV Enterprises 16, LLC ("TPOV 16");
27 Counterdefendant TPOV Enterprises, LLC ("TPOV"); Counterdefendant Rowen Seibel ("Seibel")
28 (collectively, "Seibel and the TPOV Entities"); and Defendant/Counterclaimant Paris Las Vegas

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

3 1. On July 16, 2021, TPOV 16 filed a Motion to Compel Updated Financial Data (the
4 "Motion to Compel"). (ECF No. 313.)

5 2. On August 13, 2021, Paris filed its Opposition to the Motion to Compel (ECF No.
6 322) and a Countermotion for Protective Order (the "Countermotion") (ECF No. 323).

7 3. On August 27, 2021, TPOV 16 filed its Reply in Support of the Motion to Compel
8 (ECF No. 332) and its Response to the Countermotion (ECF No. 333).

9 4. Currently, the deadline to file a Reply in support of the Countermotion is September
10 3, 2021.

11 5. The Parties have agreed and respectfully request that the deadline to file a Reply in
12 Support of the Countermotion be extended by seven (7) days to September 10, 2021, to allow Paris
13 additional time to finalize the Reply.

14 6. This is the first request to extend time, is made in good faith, with good cause, and
15 will not impact any other deadlines.

16 DATED this 3rd day of September 2021.

DATED this 3rd day of September 2021.

17 PISANELLI BICE PLLC

BAILEY KENNEDY

18 By: /s/ M. Magali Mercera
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22 *Attorneys for Paris Las Vegas Operating
Company, LLC*

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

ORDER

25 IT IS SO ORDERED.

26 
UNITED STATES MAGISTRATE JUDGE

27 DATED: 9-7-2021