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6 *Attorneys for Paris Las Vegas*  
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**

**(SECOND REQUEST)**

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

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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. On September 3, 2021, the Parties filed a Stipulation and Proposed Order Extending  
10 Deadline to File Reply in Support of Countermotion for Protective Order (First Request). (ECF No.  
11 336.)

12 5. On September 7, 2021, the Court granted the Parties' Stipulation and Proposed Order  
13 Extending Deadline to File Reply in Support of Countermotion for Protective Order (First Request).  
14 (ECF No. 337.)

15 6. Currently, the deadline to file a Reply in support of the Countermotion is  
16 September 10, 2021.

17 7. The Parties have agreed and respectfully request that the deadline to file a Reply in  
18 Support of the Countermotion be extended by seven (7) days to September 17, 2021, to allow Paris  
19 additional time to finalize the Reply.

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

3 DATED this 10th day of September 2021. DATED this 10th day of September 2021.

4 PISANELLI BICE PLLC BAILEY KENNEDY

5 By: /s/ M. Magali Mercera By: /s/ Joshua P. Gilmore  
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9 *Attorneys for Paris Las Vegas Operating  
Company, LLC*

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

10  
11 **ORDER**

12 IT IS SO ORDERED.



13  
14 UNITED STATES MAGISTRATE JUDGE

15 DATED: 9-13-2021

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