

PISANELLI BICE 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 PISANELLI BICE PLLC
400 South 7th Street, Suite 300
5 Las Vegas, Nevada 89101
Telephone: 702.214.2100

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-MDC

**STIPULATION AND PROPOSED ORDER
TO EXTEND DEADLINE TO:**

**(1) FILE REPLY IN SUPPORT OF PARIS
LAS VEGAS OPERATING COMPANY,
LLC'S MOTION TO LIFT STAY [ECF
NO. 357]; AND**

**(2) FILE REPLY IN SUPPORT OF
COUNTERMOTION TO STAY MATTER
PENDING RESOLUTION OF STATE
COURT APPELLATE PROCEEDINGS**

(FIRST REQUEST)

19
20 PARIS LAS VEGAS OPERATING
COMPANY, LLC, a Nevada limited liability
21 company,

22 Counterclaimant.

23 vs.

24 TPOV ENTERPRISES, LLC, a Delaware
Limited Liability Company, TPOV
ENTERPRISES 16, LLC, a Delaware Limited
25 Liability Company, Rowen Siebel, an
individual.

26 Counter-defendants.

28

1 Pursuant to LR IA 6-1, Plaintiff/Counterdefendant TPOV Enterprises 16, LLC ("TPOV 16");
2 Counterdefendant TPOV Enterprises, LLC ("TPOV"); Counterdefendant Rowen Seibel ("Seibel")
3 (collectively, the "TPOV Parties"); and Defendant/Counterclaimant Paris Las Vegas Operating
4 Company, LLC ("Paris") (collectively, the "Parties"), by and through their undersigned counsel of
5 record, stipulate and agree as follows:

6 1. On February 22, 2024, Paris filed a Motion to Lift Stay [ECF No. 357] (the
7 "Motion");

8 2. On March 21, 2024, the TPOV Parties filed their Response to Paris' Motion and a
9 Countermotion to Stay Matter Pending Resolution of State Court Appellate Proceedings [ECF No.
10 361] (the "Countermotion");

11 3. Paris presently has until March 28, 2024, to file its reply in support of the Motion and
12 until April 4, 2024, to file its response to the Countermotion;

13 4. Given the overlapping issues, the parties have agreed that the deadline to file the reply
14 in support of the Motion shall be extended to April 4, 2024, the same date as the deadline to file the
15 response to the Countermotion;

16 5. Additionally, in order to accommodate scheduling conflicts for the TPOV Parties'
17 counsel, the deadline for the TPOV Parties to file their reply in support of the Countermotion shall
18 be extended to April 18, 2024;

19 6. Good cause exists to extend the deadline for the reply in support of the Motion and
20 the reply in support of the Countermotion as set forth above; and

21 ///

22
23
24
25
26
27
28

PISANELLI BICE 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

7. This is the first request for extending the deadline to file the reply in support of the Motion and the reply in support of the Countermotion and is sought in good faith and not for purposes of delay.

DATED this 28th day of March 2024.

DATED this 28th day of March 2024.

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
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
8984 Spanish Ridge Avenue
Las Vegas, NV 89148-1302

Attorneys for Paris Las Vegas Operating Company, LLC

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

IT IS SO ORDERED.



Hon. Maximiliano D. Couvillier III
United States Magistrate Judge

DATED: April 1, 2024

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