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16 **UNITED STATES DISTRICT COURT**
17 **DISTRICT OF NEVADA**

18 K MYA MYA MIN, individually,
19 Plaintiff,
20 vs.
21 SAM-WILL, INC. a Nevada corporation, d/b/a
22 Fremont Hotel and Casino; NEAL JAY
23 LIPMAN, an individual; DOES I-X; and ROE
24 BUSINESS ENTITIES I-X, inclusive,
25 Defendants.

26 Case No.: 2:17-cv-00625-JCM-PAL

27 **STIPULATION AND REQUEST TO**
28 **EXTEND DEADLINE FOR SUBMISSION**
29 **OF ENE STATEMENTS**
30 **(FIRST REQUEST)**

31 Plaintiff K Mya Mya Min (“Plaintiff”), Defendants Sam-Will, Inc. and Neal Jay Lipman
32 (collectively “Defendants”), by and through their undersigned attorneys of record, hereby stipulate
33 and request that the deadline for all parties to submit their Early Neutral Evaluation Statements
34 currently due June 6, 2017, be extended to June 8, 2017. This extension is requested to allow further
35 time to facilitate settlement discussions. The parties have been engaged in early settlement
36 negotiations for the last several weeks, and believe they may be close to a resolution of this matter. If
37 a resolution can be reached this week, it will obviate the need for the ENE session scheduled for June
38 13, 2017. The parties are setting forth this request in good faith and for the purpose of ensuring the
39 parties do not incur substantial attorney’s fees associated with the Early Neutral Evaluation Statements

1 while a settlement is legitimately being pursued and may be imminent. Additionally, this request will
2 not impact the current Early Neutral Evaluation date of June 13, 2017.

3 This is the first request for an extension deadline and is not intended to cause delay or prejudice
4 to any party.

5 DATED this 5th day of June, 2017.

DATED this 5th day of June, 2017.

6 **MAIER GUTIERREZ & ASSOCIATES**

CV3 LEGAL

7 /s/ Danielle J. Barraza
8 JOSEPH A. GUTIERREZ, ESQ.
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/s/ Charles Vlasic, III
CHARLES VLASIC, III, ESQ.
Nevada Bar No. 11308
3016 W. Charleston Boulevard, Suite 170
Las Vegas, Nevada 89102
Attorneys for Defendant Neal Jay Lipman

12 DATED this 5th day of June, 2017.

13 **KAMER ZUCKER ABBOTT**

14
15 /s/ Scott M. Abbott
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17 Nevada Bar No. 4500
18 KAITLIN H. ZIEGLER, ESQ.
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*Attorneys for Defendant Sam-Will, Inc. d/b/a
Fremont Hotel and Casino*

21
22 IT IS SO ORDERED;



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24 GEORGE FOLEY, JR.
25 UNITED STATES MAGISTRATE JUDGE
26 DATED: June 6, 2017
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