

1 ADAM K. BULT, ESQ., Nevada Bar No. 9332
abult@bhfs.com
 2 EMILY A. ELLIS, ESQ., Nevada Bar No. 11956
eellis@bhfs.com
 3 MACKENZIE WARREN, ESQ., Nevada Bar No. 14642
mwarren@bhfs.com
 4 BROWNSTEIN HYATT FARBER SCHRECK, LLP
 100 North City Parkway, Suite 1600
 5 Las Vegas, NV 89106-4614
 Telephone: 702.382.2101
 6 Facsimile: 702.382.8135

7 Attorneys for Defendants Five Star Restaurants, LLC; Westbury
 Manor Enterprises, Inc.; Vincent Scotto; and Michelina Scotto
 8

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 PHILADELPHIA INDEMNITY
 INSURANCE COMPANY, a Pennsylvania
 12 Corporation;

13 Plaintiff,

14 v.

15 FIVE STAR RESTAURANTS, LLC, a
 Nevada limited liability company;
 WESTBURY MANOR ENTERPRISES,
 16 INC., a Delaware foreign business
 corporation; VINCENT SCOTTO, an
 17 individual; MICHELINA SCOTTO, an
 individual; DOE INDIVIDUALS 1 through
 18 10, inclusive; ROE BUSINESS ENTITIES
 11 through 20, inclusive;

19 Defendants.
 20

CASE NO.: 2:17-cv-00871-APG-PAL

**STIPULATION AND [PROPOSED]
 ORDER FOR EXTENSION OF TIME TO
 RESPOND TO PHILADELPHIA
 INDEMNITY COMPANY'S MOTION TO
 COMPEL AND FOR SANCTIONS [ECF
 NO. 52]**

(Second Request)

21 Defendants Five Star Restaurants, LLC, Westbury Manor Enterprises, Inc., Vincent
 22 Scotto, and Michelina Scotto ("Defendants"), by and through their counsel of record the law firm
 23 of Brownstein Hyatt Farber Schreck, LLP; and Plaintiff Philadelphia Indemnity Insurance
 24 Company ("Plaintiff", together with Defendants, the "Parties"), by and through its counsel of
 25 record The Faux Law Group, hereby stipulate and agree as follows:

26 1. On December 13, 2017, Plaintiff filed its Motion to Compel and for Sanctions
 27 ("Motion") (ECF No. 52).
 28

1 2. Defendants' Opposition was due on December 27, 2017. However, Defendants
2 sought a two-week extension of time to file an opposition in light of scheduling constraints due to
3 the holidays and deadlines in other matters. Plaintiff agreed to provide Defendants this two-week
4 extension.

5 3. Therefore, the Parties filed a Stipulation and Proposed Order for Extension of
6 Time to Respond to Philadelphia Indemnity Company's Motion to Compel and for Sanctions
7 ("First Stipulation") seeking to extend the Defendants' opposition deadline to January 8, 2018.
8 (ECF No. 55).

9 4. Thereafter, on January 4, 2018, the Court issued an Order granting the First
10 Stipulation. (ECF No. 56).

11 5. Following entry of the Order, the Parties engaged in efforts to resolve the issues
12 raised in the Motion. In light of the Parties' ongoing efforts to resolve the issues, the Parties
13 hereby agree, subject to the Court's approval, to extend the deadline for Defendants to file their
14 opposition to the Motion until January 19, 2018.

15 DATED this 9th day of January, 2018.

DATED this 9th day of January, 2018.

16 BROWNSTEIN HYATT FARBER
17 SCHRECK, LLP

THE FAUX LAW GROUP

18 By: /s/ Emily A. Ellis
19 ADAM K. BULT, ESQ., #9332
20 EMILY A. ELLIS, ESQ., #11956
21 MACKENZIE WARREN, ESQ., #14642
100 North City Parkway, Suite 1600
Las Vegas, NV 89106-4614

By: /s/ Jordan F. Faux
KURT C. FAUX, ESQ., #3407
JORDAN F. FAUX, ESQ., #12205
1540 W. Warm Springs Road, Suite 100
Henderson, NV 89014

Attorneys for Plaintiff

Attorneys for Defendants

22 IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that the foregoing
23 Stipulation is APPROVED.

24 **IT IS SO ORDERED:**

25 
26 UNITED STATES MAGISTRATE JUDGE

27 DATED this 19 day of January, 2018.