

LAGOMARSINO LAW

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Attorney for Plaintiffs Sean Kennedy, Andrew Snider, Christopher Ward,
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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SEAN KENNEDY, an individual; ANDREW
SNIDER, an individual, CHRISTOPHER
WARD, an individual; RANDALL WESTON, an
individual; and RONALD WILLIAMSON, an
individual;

Plaintiffs,

vs.

LAS VEGAS SANDS CORP., a Domestic
Corporation; SANDS AVIATION, LLC, a
Domestic Limited-Liability Company;

Defendants.

CASE NO.: 2:17-cv-00880-JCM-VCF

STIPULATION AND ORDER TO
EXTEND PRETRIAL ORDER
DEADLINE AND RELATED DEADLINES

(Second Request)

Pursuant to LR 6-1 and LR 26-4, the parties, by and through their respective counsel of record, hereby stipulate and request that this Court extend the current deadline to file the Joint Pretrial Order in the above-captioned case by thirty (30) days, up to including January 17, 2020. This Stipulation is the second request to extend the joint pretrial order deadline in this case.

The reason for the extension is as follows: (1) the parties have to sort through and analyze over thirty thousand (30,000) pages of documents to identify exhibits; (2) Plaintiff’s counsel is involved in heavy briefing on a separate matter Farmer v. LVMPD, et al., Case No.: 2:18-cv-00860-GMN-VCF that will require him to draft four (4) to six (6) briefs in the next fifteen (15) days; (3) Plaintiff’s counsel will have to respond to multiple dispositive motions filed in the same case after December 16, 2019; and (4) Plaintiff’s counsel’s office is short-staffed this week for the Thanksgiving Holiday (and exhibit exchanges are to take place after the holiday (12/3).

In support of this Stipulation, the parties have agreed on the following internal deadlines

1 related to the joint pretrial order:

2 WHEREAS the parties have agreed on the following deadlines:

3 1) The parties are to exchange proposed exhibits on January 6, 2020.

4 2) The parties are to serve objections to proposed exhibits on January 13, 2020.

5 3) The parties will exchange language to be incorporated into the pretrial order on January
6 15, 2020.

7 4) The parties will conduct a telephone conference on January 16, 2020 to discuss final
8 language to be incorporated into the pretrial order and any remaining issues. Should the parties not
9 agree on the final language in the pretrial order, the parties have agreed to file individual pretrial
10 orders.

11 5) The parties agree to identify potential deposition transcript designations of unavailable
12 witnesses, parties and 30(b)(6) witnesses sixty (60) days before trial.

13 6) The parties will file the Pre-Trial Order by January 17, 2020.

14 This extension is made in good faith and is not intended for purposes of delay.

15 **IT IS SO STIPULATED AND AGREED.**

16 DATED this 25th day of November, 2019.

DATED this 25th day of November, 2019.

17 LAGOMARSINO LAW

DLA PIPER LLP (US)

18
19 /s/ Andre Lagomarsino
20 Andre M. Lagomarsino, Esq. (#6711)
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23 Attorney for Plaintiffs Sean Kennedy,
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25 Randall Weston and Ronald Williamson

/s/ Mary Dollarhide
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Attorneys for Defendants

24 **IT IS SO ORDERED.**

26 UNITED STATES MAGISTRATE JUDGE

27 11-26-2019

28 DATED