

Kelly H. Dove  
 Nevada Bar No. 10569  
 Michael Paretti  
 Nevada Bar No. 13926  
 SNELL & WILMER L.L.P.  
 3883 Howard Hughes Parkway  
 Suite 1100  
 Las Vegas, Nevada 89169  
 Telephone: 702.784.5200  
 Facsimile: 702.784.5252  
 Email: [kdove@swlaw.com](mailto:kdove@swlaw.com)  
[mparetti@swlaw.com](mailto:mparetti@swlaw.com)

*Attorneys for Defendant Einstein and Noah Corp. DBA  
 Einstein Bros Bagels*

**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

Kevin Zimmerman, and individual,  
  
 Plaintiff,

vs.

Einstein and Noah Corp. Dba Einstein Bros  
 Bagels,  
  
 Defendant.

**Case No. 2:17-cv-00935-JCM-VCF**

**STIPULATION AND ORDER FOR  
 EXTENSION TO RESPOND TO  
 COMPLAINT**

**(THIRD REQUEST)**

Plaintiff Kevin Zimmerman (“Plaintiff”) and Defendant Einstein and Noah Corp. d/b/a Einstein Bros. Bagels (“Einstein”) by and through their undersigned counsel (collectively the “Parties”), for good cause shown, hereby stipulate and agree to extend Einstein’s deadline to respond to Plaintiff’s Complaint [Doc #1] to August 2, 2017. This is the Parties’ third and final extension request.

Pursuant to Federal Rule of Civil Procedure 6(b)(1) and Local Rule 6-1, there exists good cause to grant this extension to respond for the following reasons:

1. Plaintiff served the Complaint and Summons on Einstein on April 13, 2017.
2. The Parties previously stipulated to extend Einstein’s response deadline, and Einstein’s response is currently due July 3, 2017.
3. Einstein needs the requested time to evaluate Plaintiff’s allegations as well as the possibility of early resolution options. Specifically, Einstein’s evaluation of Plaintiff’s allegations

1 involves site inspections of the relevant property, and Einstein needs additional time to  
 2 investigate sufficiently. Furthermore, Einstein's representatives involved in case evaluation have  
 3 had previously-scheduled vacations that have interfered with the current deadline to respond.

4 4. The Parties agreed to the extension requested herein.

5 5. This stipulated extension request is sought in good faith and is not made for the  
 6 purpose of delay.

7 Therefore, the Parties jointly agree to extend Einstein's deadline to respond to Plaintiff's  
 8 Complaint to August 2, 2017.

9 DATED: JUNE 26, 2017

DATED: JUNE 26, 2017

SNELL & WILMER L.L.P.

10 THE WILCHER FIRM

11 BY: /s/ Whitney C. Wilcher

By: /s/ Michael Paretti

12 Whitney C. Wilcher  
 13 8465 West Sahara Avenue  
 14 Suite 111-236  
 Las Vegas, Nevada 89117

Kelly H. Dove  
 Michael Paretti  
 3883 Howard Hughes Parkway  
 Suite 1100  
 Las Vegas, Nevada 89169

15 *Attorneys for Plaintiff Kevin Zimmerman*

*Attorneys for Defendant Einstein and Noah Corp.*

17 **ORDER**

18 **IT IS ORDERED** that Einstein shall respond to Plaintiff's Complaint by August 2, 2017.

19 DATED: \_\_\_\_\_ June 27 \_\_\_\_\_, 2017.

21   
 22 UNITED STATES MAGISTRATE JUDGE

22 Respectfully submitted,

23 SNELL & WILMER L.L.P.

24 By: /s/ Michael Paretti

25 Kelly H. Dove  
 26 Michael Paretti  
 SNELL & WILMER L.L.P.  
 3883 Howard Hughes Parkway  
 Suite 1100  
 Las Vegas, Nevada 89169  
 Attorneys for Defendant  
 4824-4227-9497