

1 **DICKINSON WRIGHT PLLC**
 JOHN L. KRIEGER (Nevada Bar No. 6023)
 2 Email: jkrieger@dickinsonwright.com
 3 8363 West Sunset Road, Suite 200
 Las Vegas, NV 89113
 4 Telephone: 702-550-4440
 Fax: 844-670-6009

5 **ONDERLAW, LLC**
 6 James R. Dowd (Missouri Bar No. 28818MO) (*Pro Hac Vice*)
 Email: jim@dowdj.com
 7 MATTHEW P. O'GRADY (Missouri Bar No. 47543MO) (*Pro Hac Vice*)
 8 Email: mpo@onderlaw.com
 110 East Lockwood, 2nd Floor
 9 St. Louis, Missouri 63119
 Telephone: 314-963-9000
 10 Fax: 314-963-1700

11 *Attorneys for Plaintiff Ken Warren*

12 **UNITED STATES DISTRICT COURT**
 13 **DISTRICT OF NEVADA**

14 KEN WARREN,

15 Plaintiffs,

16 vs.

17 CARDOZA PUBLISHING, INC., and AVERY
 18 CARDOZA *also known as* ALLAN
 19 SILBERSTANG,

20 Defendant.

Case No. 2:17-cv-01100-JAD-GWF

STIPULATION AND ORDER

(Second Request)

21 On March 15, 2018, the Court held a hearing on Plaintiff's Motion to Compel Complete
 22 Rule 26(a) Disclosures and Requested Documents. During the hearing, the Court requested that
 23 the parties attempt another meet and confer to assess whether further action from this Court
 24 would be necessary on the pending motion. (*See* ECF No. 80.) The parties meet and conferred on
 25 March 15, 2018, as well as on March 16, 2018. As a result of those conferences, Defendants have
 26 agreed to provide additional documentation. However, the scope of that documentation may still
 27 be an issue for Plaintiff. Nevertheless, in order to allow Defendants sufficient time to review their
 28 records and produce the same to Plaintiff, the parties agreed to allow for an additional week to

1 provide an opportunity for that production and evaluation to occur, which the Court granted.
2 (ECF Doc. 82.) Defendants' counsel, unfortunately, was called away on a family issue and did
3 not have the time to work with his clients on the supplemental production. Therefore, the parties
4 seek additional time.

5 The parties requested additional time up through and including **April 6, 2018**, in which to
6 either provide the supplemental briefing addressed at the hearing or file a stipulation/notice that
7 the motion has been resolved. (ECF Doc. 84.) The Court entered an order allowing the extension
8 of time to April 6, 2018. (ECF Doc. 85.)

9 In the interim, Defendants have retained new counsel and have executed a Substitution of
10 Counsel which will be filed with the Court immediately. Defendants' newly retained attorney has
11 contacted Plaintiff's attorney with regard to this matter. In order to allow Defendants' newly
12 retained, soon-to-be substituted counsel additional time to review the pending issues and meet
13 and confer with Plaintiff's counsel, the parties have agreed to additional time up through and
14 including April 20, 2018, in which to either provide the supplemental briefing requested at the
15 hearing or file a stipulation/notice that the motion has been resolved.


16 IT IS SO STIPULATED.

17 Dated this 6th day of April, 2018.

<p>18 DICKINSON WRIGHT PLLC</p> <p>19 <u>/s/ John L. Krieger</u></p> <p>20 JOHN L. KRIEGER, Esq.</p> <p>21 8363 West Sunset Road, Suite 200</p> <p>22 Las Vegas, NV 89113</p> <p>23 Telephone: 702-550-4440</p> <p><i>Attorneys for Plaintiff</i></p>	<p>18 HOFLAND & TOMSHECK</p> <p>19 <u>/s/Bradley Hofland</u></p> <p>20 Bradley Hofland, Esq.</p> <p>21 228 South 4th Street, 1st Floor</p> <p>22 Las Vegas, NV 89101</p> <p>23 Telephone: 702-895-6760</p> <p><i>Attorney for Defendants</i></p>
--	---

24 IT IS SO ORDERED

25 Date: 4/10/2018

26 
 27 The Hon. George W. Foley, Jr.
 28 U.S. MAGISTRATE JUDGE