1 Leah A. Martin, Esq. Nevada Bar No. 7982 Christopher Huang, Esq. Nevada Bar No. 14061 2 3 LEAH MARTIN LAW 6671 S. Las Vegas Blvd., Ste. 210 4 Las Vegas, Nevada 89119 Telephone: (702) 420-2733 5 Facsimile: (702) 330-3235 lmartin@leahmartinlv.com 6 chuang@leahmartinlv.com Attorney for Defendants 7 UNITED STATES DISTRICT COURT 8 FOR THE DISTRICT OF NEVADA 9 BRIAN HEBERT, an individual, Case No.: 2:17-cv-01536-KJD-CWH 10 Plaintiff, STIPULATION AND ORDER TO 11 **CONTINUE EARLY NEUTRAL EVALUATION** VS. 12 THE LITIGATION DOCUMENT GROUP, (SECOND REQUEST) 13 INC., a Domestic Corporation; CRAIG RENARD, an individual; DOES I through X, 14 inclusive; ROE CORPORATIONS I through X, inclusive, 15 Defendants. 16 STIPULATION AND ORDER TO CONTINUE 17 **EARLY NEUTRAL EVALUATION** (Second Request) 18 Pursuant to LR IA 6-1, LR IA 6-2, LR 16-6, LR 26-4, and the Court's October 23, 19 2017 Order (Docket #24), the Parties hereto, by and through their attorneys of record, 20 respectfully submit their Stipulation and Order to Continue the Early Neutral Evaluation. 21 This is the Parties' Second Request to Continue the Early Neutral Evaluation. 22 The Parties' First Request was made on October 23, 2017 when Plaintiff's counsel, L. 23 Joe Coppedge, telephonically informed the Court of a family emergency. As such, the Court 24 vacated the Early Neutral Evaluation scheduled for October 24, 2017 and rescheduled it for 25 November 28, 2017. The Court noted that everything else in its September 11, 2017 Order 26 (Docket #15) remains unchanged. 27 /// 28

I. Good Cause to Continue Early Neutral Evaluation

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As mentioned above, Plaintiff's counsel had a family emergency that necessitated the rescheduling of the Early Neutral Evaluation. When the Court issued its Order rescheduling the Early Neutral Evaluation, Defendants' counsel, Christopher Huang, informed Plaintiff's counsel that the Defendants' representative with decision-making authority would not be available for the Early Neutral Evaluation due to the Thanksgiving holiday. Plaintiff's counsel agreed to prepare the Stipulation to Continue the Early Neutral Evaluation. However, due to Plaintiff's counsel's family emergency, the Stipulation to Continue the Early Neutral Evaluation was not submitted 21 days before November 28, 2017.

II. Proposed Dates to Reschedule the Early Neutral Evaluation

The Parties have been informed that the Court is available to conduct the Early Neutral Evaluation in January and that we should include proposed dates. Please find the proposed dates below:

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14
            January 3, 2018
                                Wednesday
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           January 5, 2018
                                Friday
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            January 8, 2018
                                Monday
17
            January 10, 2018
                                Wednesday
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           January 11, 2018
                                Thursday
19
            January 15, 2018
                                Monday
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            January 16, 2018
                                Tuesday
21
            January 17, 2018
                                Wednesday
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            January 18, 2018
                                Thursday
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1	III. Conclusion	
2	Based on the foregoing, the Parties respectfully submit that the Court reschedule the	
3	Early Neutral Evaluation to one of the proposed dates when all required people will be able	
4	to attend.	
5	RESPECTFULLY SUBMITTED,	
6		
7	Dated this 21st day of November, 2017	Dated this 21st day of November, 2017
8	MUSHKIN CICA COPPEDGE	LEAH MARTIN LAW
9	/s/ Joe Coppedge	/s/ Christopher Huang
10	L. JOE COPPEDGE, ESQ.	LEAH A. MARTIN, ESQ
11	Nevada Bar No. 4954	Nevada Bar No. 7982
12	4475 S. Pecos Road Las Vegas, NV 89121	CHRISTOPHER HUANG, ESQ. Nevada Bar No. 14061
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14	jcoppedge@mccnvlaw.com	Telephone: 702-420-2733
15	Attorneys for Plaintiff	Facsimile: 702-330-3235

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