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11 Attorneys for Defendants

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

14 STEVEN RINGELBERG,
15
16 Plaintiff,
17 v.
18 VANGUARD INTEGRITY
PROFESSIONALS - NEVADA, INC., a
19 Nevada corporation, VANGUARD
INTEGRITY PROFESSIONALS, INC., a
20 Nevada corporation; DOES 1-10; and ROE
ENTITIES 11-20,
21
22 Defendants.

Case No.: 2:17-cv-01788-JAD-PAL

**STIPULATION AND ORDER
REGARDING SETTLEMENT AND STAY
OF LITIGATION**

23
24 On March 29, 2019, Steven Ringelberg (the “Plaintiff”), and Vanguard Integrity
25 Professionals – Nevada, Inc., Vanguard Integrity Professionals, Inc. (collectively, the
26 “Defendants”), submitted a Joint Status Report stating that the parties reached the economic terms
27 of settlement. ECF No. 207. Consistent with the Joint Status Report, the Parties continue to
28

1 negotiate settlement terms in good faith. The Parties are close to settlement but need additional
2 time to finalize all terms.

3 **THEREFORE**, the Parties, by and through their undersigned counsel, stipulate and agree
4 as follows:

5 1. The Parties shall have until April 23, 2019, to advise this Court of the final
6 settlement between the Parties.

7 2. The stipulation and order for dismissal shall be submitted to this court ten (10) days
8 after April 23, 2019.¹

9 3. If the Parties are unable to reach a final settlement, the Parties' Proposed Pre-trial
10 Orders shall be submitted no later than April 30, 2019.

11 **RESPECTFULLY SUBMITTED** this 18th day of April, 2019.

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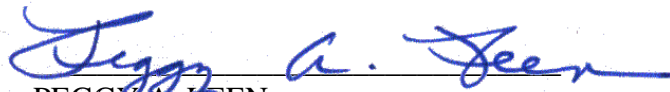
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20 **IT IS SO ORDERED.**

21
22 
23 PEGGY A. ZEEN
24 UNITED STATES MAGISTRATE JUDGE

25 Dated this 26th day of April, 2019.

26
27 ¹ Based on Mr. Ringelberg's rights under the Age Discrimination in Employment Act of
28 1967 ("ADEA") and the Older Workers Benefit Protection Act ("OWBPA") (the "Acts"), the
Parties choose to allow the Defendants ten (10) days to effectuate the settlement payment.