

WENDY M. KRINCEK, ESQ., Bar # 6417
MARCUS B. SMITH, ESQ., Bar # 12098
LITTLER MENDELSON, P.C.
3960 Howard Hughes Parkway
Suite 300
Las Vegas, NV 89169-5937
Telephone: 702.862.8800
Fax No.: 702.862.8811
Email: wkrincek@littler.com
mbsmith@littler.com

Attorneys for Defendants
Dreamdealers USA, LLC d/b/a Exotics Racing,
David Perisset, and Roman Thievin

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

EDWARD B. DOUGLAS, an individual,
Plaintiffs,

vs.

DREAMDEALERS USA, LLC d/b/a
EXOTICS RACING, A Nevada limited
liability company, DAVID PERISSET, an
individual, and ROMAN THIEVIN, an
individual,

Defendant.

Case No. 2:17-cv-02134-APG-BNW

**STIPULATION AND ORDER AWARDED
FEES AND COSTS TO DEFENDANTS**

Plaintiff EDWARD B. DOUGLAS ("Plaintiff") and Defendants DREAMDEALERS USA, LLC D/B/A EXOTICS RACING, DAVID PERISSET, AND ROMAN THIEVIN ("Defendants"), by and through their undersigned counsel, hereby agree and stipulate to award fees and costs to Defendants in the amount of \$7,020.00.

On February 26, 2020, the Court held a hearing regarding Defendants' Motion to Compel Discovery (ECF No. 50) and Motion to Re-Open Discovery (ECF No. 51). In ruling upon said Motions, the Court ordered Plaintiff to pay reasonable attorneys' fees and costs to Defendants in connection with the filing of said Motions. (ECF No. 68, Minutes of Proceedings; Transcripts of Proceedings at 18:15-23). The Court further ordered the parties to meet and confer regarding what

1 constitutes reasonable attorneys' fees. (Transcripts of Proceedings at 18:15-23). The parties have
 2 done so and have agreed that \$7,020.00 is reasonable. The parties have further agreed that Plaintiff
 3 shall pay this amount within thirty days of the entry of this Order Awarding Fees and Costs to
 4 Defendants.

5 Therefore, the parties stipulate and request that an award of \$7,020.00 be awarded as
 6 reasonable attorneys' fees and costs, and that Plaintiff pay this amount to Defendants within thirty
 7 days of the entry of this Order.

8 Dated: May 5, 2020

Dated: May 5, 2020

9 Respectfully submitted,

Respectfully submitted,

11 /s/ Dustin Clark

/s/ Marcus B. Smith

12 DUSTIN L. CLARK, ESQ.
 HOLLEY DRIGGS

WENDY M. KRINCEK, ESQ.
 MARCUS B. SMITH, ESQ.
 LITTLER MENDELSON, P.C.

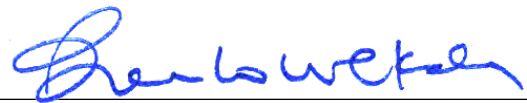
13 Attorney for Plaintiff

Attorneys for Defendants

15 **ORDER**

16 **IT IS SO ORDERED.**

17 Dated: May 6, 2020.

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21 UNITED STATES MAGISTRATE JUDGE

22 4825-5365-0107.1 087825.1002