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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JOSE BETANCOURT, An Individual) CASE NO. **2:17-cv-02452-RFB-VCF**
)
Plaintiff,)
)
vs.)
)
NEVADA PROPERTY 1 LLC, a Foreign)
Limited Liability Company d/b/a The)
Cosmopolitan of Las Vegas, DOES I-X;)
ROE CORPORATIONS I-X.)
)
Defendants.)
)

**STIPULATION AND ORDER TO EXTEND DEADLINES FOR OPPOSITION TO
AND REPLY IN SUPPORT OF DEFENDANT’S MOTION TO DISMISS
(FIRST REQUEST)**

Plaintiff JOSE BETANCOURT (“Plaintiff”), by and through his attorney, JENNY L. FOLEY, Ph.D., ESQ., of the law firm HKM EMPLOYMENT ATTORNEYS LLP, and Defendant NEVADA PROPERTY 1 LLC (“Defendant”), by and through its attorney, SCOTT M. ABBOTT, ESQ., of KAMER ZUCKER ABBOTT, hereby stipulate and agree as follows:

1. That Plaintiff’s Opposition to Defendant’s Motion to Dismiss, filed on November 30, 2017, which Opposition is currently due by December 14, 2017, be extended until January 4, 2018.

1 2. That Defendant's Reply in support of its Motion to Dismiss be extended until
2 January 25, 2018.

3 3. This extension of time request is made in good faith and not for purposes of
4 delay. The parties have requested this extension of time due to the upcoming holidays and
5 counsels' respective other pre-existing calendar commitments.
6

7 4. This is the first request for an extension of time in this matter.

8 Dated this 13th day of December, 2017. Dated this 13th day of December, 2017.


9 **HKM Employment Attorneys LLP**

Kamer Zucker Abbott

10
11 /s/ Jenny L. Foley
12 Jenny L. Foley, Esq.
13 Nevada Bar No. 9017
14 1785 East Sahara Ave, Suite 325
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/s/ Scott M. Abbott
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Attorney for Defendant

15
16 **IT IS SO ORDERED;**

17 

18 **UNITED STATES DISTRICT JUDGE**

19 DATED: December 15, 2017