

Snell & Wilmer
LLP
LAW OFFICES
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, Nevada 89139
702-784-5200

1 Nathan G. Kanute
2 Nevada Bar No. 12413
3 SNELL & WILMER L.L.P.
4 3883 Howard Hughes Parkway, Suite 1100
5 Las Vegas, Nevada 89169
6 Telephone: (702) 784-5200
7 Facsimile: (702) 784-5252
8 Email: nkanute@swlaw.com

9 *Attorneys for Plaintiffs*

10
11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 WB MUSIC CORP.; FLYTE TYME TUNES;
14 MEEENGYA MUSIC; AND MICK DOG
15 MUSIC,

16 Plaintiffs,

17 vs.

18 HOFFDEL LLC, D/B/A TIME-OUT SPORTS
19 BAR & GRILL; JOSEPH DELEFAVE; AND
20 FREDERICK HOFFMAN,

21 Defendants.

Case No. 2:18-cv-00267-RFB-CWH

**PLAINTIFFS' MOTION TO STAY
PROCEEDINGS PENDING
SETTLEMENT**

AND

ORDER

(FIRST REQUEST)

22 Plaintiffs WB Music Corp., Flyte Tyme Tunes, Meeengya Music, and Mick Dog Music
23 ("Plaintiffs"), by and through counsel, Snell & Wilmer L.L.P., hereby request that the Court stay
24 these proceedings in their entirety pending settlement. In support of this request for a stay of these
25 proceedings, Plaintiffs state as follows:

26 On April 16, 2018 at 1:30 p.m., the undersigned conducted a telephonic scheduling
27 conference with Defendants Joseph Delefave and Frederick Hoffman for purposes of discussing a
28 discovery schedule for this matter and the potential for a resolution. As a result of the scheduling
call, additional calls were set up and communications were sent in an effort to reach a resolution
of this matter without the need for further litigation. After some back and forth negotiation, Mr.
Delefave has confirmed by email the agreement of the Defendants to the essential terms of a

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

settlement proposed by Plaintiffs. The undersigned is in the process of drafting a settlement agreement to finalize the settlement and resolve this matter in its entirety. When settlement is finalized, the parties will file a stipulated dismissal. Given that the parties have effectively settled this matter in its entirety, a stay of further proceedings would be appropriate. If settlement terms are not finalized within 90 days of this Motion, Plaintiffs will submit a status report to the Court providing an update on the status of settlement.

WHEREFORE, Plaintiffs respectfully requests that this matter be stayed in its entirety with a status report to be filed within 90 days of this Motion if the case has not been dismissed.

Dated: June 4, 2018

SNELL & WILMER L.L.P.

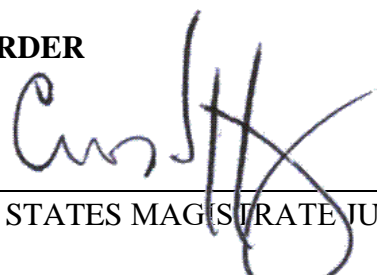
By: /s/ Nathan G. Kanute

Nathan G. Kanute (NV Bar No. 12413)
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, Nevada 89169

Attorneys for Plaintiffs

IT IS SO ORDERED

ORDER



UNITED STATES MAGISTRATE JUDGE

Dated: July 3, 2018

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing with the Clerk of Court for the U.S. District Court, District of Nevada by using the Court’s CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

DATED: June 4, 2018

/s/ Lara J. Taylor
An Employee of Snell & Wilmer L.L.P.