I	CHRISTENSEN JAMES & MARTIN		
2	EVAN L. JAMES, ESQ. (7760)		
3	DARYL E. MARTIN, ESQ. (6735)		
5	7440 W. Sahara Avenue		
4	Las Vegas, Nevada 89117		
5	Telephone: (702) 255-1718		
	Facsimile: (702) 255-0871		
6	Attorneys for Defendants Nevada Service Employees		
7			
8	UNITED STATES DISTRICT COURT		
9	DISTRICT OF NEVADA		
10	JAVIER CABRERA, et al.		
11	,	Case No.: 2:18-cv-00304-RFB-DJA	
12	Plaintiffs,		
		STIPULATION TO EXTEND	
13	VS.	DEADLINE TO RESPOND TO MOTIONS IN LIMINE AND	
14	SERVICE EMPLOYEES	MOTION TO BIFURCATE TRIAL	
15	INTERNATIONAL UNION, et al.,		
		(FIRST REQUEST)	
16	Defendants.		
17			

18 Pursuant to LR IA 6-1, Plaintiff Debbie Miller and Defendants Service 19 Employees International Union ("SEIU") and Clark County Public Employees 20 Association dba Nevada Service Employees Union ("Local 1107") (collectively the 21 "Parties"), acting through their respective counsel of record, respectfully submit this 22 Stipulation to Extend Deadline to Respond to the Parties' Motions in Limine (ECF 23 Nos. 267, 268, 270, 271, 272, 273, 274, 275) and Defendants' Motion to Bifurcate 24 Trial (ECF 269), all of which were filed on September 1, 2023. This is the first 25 request for an extension of time to respond to these motions.

Given the number and nature of the issues presented in the aforementioned
motions, counsel for the Parties have agreed to jointly request the Court's Order

extending the response deadline by two weeks, from September 15 to September 29,
 2023. This extension is being requested in good faith and will not delay further
 proceedings in this Case.

4		
5	CHRISTENSEN JAMES & MARTIN	ROTHNER, SEGALL & GREENSTONE
6	By: /s/ Daryl E. Martin	By: /s/ Eli Naduris-Weissman
7	Daryl E. Martin, Esq.	Eli Naduris-Weissman, Esq.
	Nevada Bar No. 6735	Pro Hac Vice
8	7440 W. Sahara Avenue	510 S. Marengo Ave.
9	Las Vegas, NV 89117 Tel.: (702) 255-1718	Pasadena, California 91101-3115 Tel.: (626) 796-7555
10	Fax: (702) 255-0871	enaduris-weissman@rsglabor.com
	dem@cjmlv.com	Attorneys for Defendants SEIU and
11	Attorneys for Defendants Local	Mary Kay Henry
12	1107, Luisa Blue, and	
13	Martin Manteca	
	By: <u>/s/ Michael J. Mcavoyamaya</u>	
14	Michael J. Mcavoyamaya, Esq.	_
15	Nevada Bar No. 14082	
16	4539 Paseo Del Ray	
	Las Vegas, NV 89121 Tel.: (702) 299-5083	
17	mike@mrlawlv.com	
18	Attorney for Plaintiff Debbie Miller	
19		
20	ORDER	
21	Good cause appearing, the Court grants the foregoing Stipulation to Extend	
22	Deadline to Respond to the Motions in Limine and Motion to Bifurcate Trial filed	
23	by the Parties on September 1, 2023. Responses shall be filed on or before September	
24	29, 2023.	
25	27, 2023.	- The
23		
26		United States District Court Judge
27		$D \neq 1$ September 11, 2022
		Dated: September 11, 2023