

Jay J. Schuttert, Esq. (Nevada Bar No. 8656)  
 David W. Gutke, Esq. (Nevada Bar No. 9820)  
 EVANS FEARS & SCHUTTERT LLP  
 6720 Via Austi Parkway, Suite 300  
 Las Vegas, NV 89119 Telephone: (702) 805-0290  
 Facsimile: (702) 805-0291  
 Email: [jschuttert@efstriallaw.com](mailto:jschuttert@efstriallaw.com)  
 Email: [dgutke@efstriallaw.com](mailto:dgutke@efstriallaw.com)

Andrew Z. Weaver (*pro hac vice*)  
 Michael D. Pegues (*pro hac vice*)  
 POLSINELLI PC  
 1000 Louisiana Street, Suite 6400  
 Houston, TX 77002  
 Telephone: (713) 374-1600  
 Facsimile: (713) 374-1601  
 Email: [aweaver@polsinelli.com](mailto:aweaver@polsinelli.com)  
 Email: [mpegues@polsinelli.com](mailto:mpegues@polsinelli.com)

David S. Krakoff (*pro hac vice*)  
 Benjamin B. Klubes (*pro hac vice*)  
 Lauren R. Randell (*pro hac vice*)  
 Adam Miller (*pro hac vice*)  
 BUCKLEY LLP  
 2001 M Street NW, Suite 500  
 Washington, DC 20036  
 Telephone: (202) 349-8000  
 Facsimile: (202) 349-8080  
 Email: [dkrakoff@buckleyfirm.com](mailto:dkrakoff@buckleyfirm.com)  
 Email: [bkлубes@buckleyfirm.com](mailto:bkлубes@buckleyfirm.com)  
 Email: [lrاندell@buckleyfirm.com](mailto:lrاندell@buckleyfirm.com)  
 Email: [amiller@buckleyfirm.com](mailto:amiller@buckleyfirm.com)

*Attorneys for Plaintiff/Counter-Defendants*

**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

UNIVERSAL ENTERTAINMENT  
 CORPORATION, a Japanese corporation,

Plaintiff,

vs.

ARUZE GAMING AMERICA, INC., a Nevada  
 corporation, KAZUO OKADA, an individual,

Defendants.

ARUZE GAMING AMERICA, INC., a Nevada  
 corporation, KAZUO OKADA, an individual,

Counter-Claimants,

vs.

UNIVERSAL ENTERTAINMENT  
 CORPORATION, a Japanese corporation,  
 ARUZE USA, a Nevada corporation, and JUN  
 FUJIMOTO, an individual,

Counter-Defendants.

**Case No.: 2:18-CV-00585 (RFB)(NJK)**

**JOINT STIPULATION TO EXTEND  
 TIME FOR PLAINTIFF TO PRODUCE  
 DOCUMENTS REQUIRED BY THE  
 COURT'S ORDER DATED  
 SEPTEMBER 1, 2020 (ECF NO. 223)**

**(FIRST REQUEST)**

1 IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff Universal  
2 Entertainment Corporation (“UEC”), Counter-defendants Aruze USA, Inc. and Jun Fujimoto (UEC  
3 and Mr. Fujimoto are collectively referred to as “UEC Parties”), and Defendants Aruze Gaming  
4 America, Inc. and Mr. Kazuo Okada, by and through their respective counsel of record, and pursuant  
5 to LR IA 6-1 and LR 26-3, that the time for the UEC Parties to produce certain documents and logs  
6 of other documents not being produced, as required by the Court’s Order dated September 1, 2020  
7 (ECF No. 223) (“the Order”), shall be extended from December 1, 2020 to February 1, 2021. This is  
8 the first stipulation for extension of time regarding compliance with the Order.

9 There is good cause for this extension. Since the hearing held on September 1, 2020, the UEC  
10 Parties represent that their attorneys and employees have devoted thousands of hours to compliance  
11 with the Order. As of the date of this stipulation, UEC has produced more than 6,700 documents and  
12 logged more than 3,800 documents pursuant to the Order, including documents and logs produced on  
13 the date of this stipulation. While the UEC Parties represent they will be close to completing their  
14 production of documents required by the Order from corporate-owned accounts and devices by  
15 December 1, the UEC Parties represent that they primarily need additional time to complete their  
16 production of documents required by the Order from Mr. Fujimoto’s personal accounts and devices  
17 as well as from devices under his care, custody or control, due to the number of accounts at issue and  
18 various technical and logistical difficulties that have been encountered. The UEC Parties agree that  
19 they will make rolling productions of documents and logs required by the Order every 20 days during  
20 the time remaining for compliance with the Order, beginning on the date of this stipulation.

21 Finally, while the Order also requires that the limited deposition of Counter-Defendant Jun  
22 Fujimoto be taken by March 1, 2021, and overall fact discovery is scheduled to end on April 30,  
23 2021, the Parties are simultaneously submitting a Joint Status Report addressing the fact that  
24 depositions are highly unlikely to be possible by either March 1 or April 30 due to the Covid-19  
25 pandemic and will be seeking the Court’s guidance regarding deadlines for depositions. The Parties  
26 respectfully submit, therefore, that the extension sought here will not adversely affect the remainder  
27 of the schedule in this case.

Accordingly, for good cause showing, the parties have agreed to the foregoing extension.

Dated this 24<sup>th</sup> day of November, 2020.

EVANS FEARS & SCHUTTERT LLP

HOLLAND & HART LLP

By: /s/ Jay J. Schuttert

By: /s/ Bryce K. Kunimoto

Jay J. Schuttert, Esq.  
Nevada Bar No. 8656  
David W. Gutke, Esq.  
Nevada Bar No. 9820  
6720 Via Austi Parkway, Suite 300  
Las Vegas, NV 89119

J. Stephen Peek, Esq.  
Nevada Bar No. 1758  
Bryce K. Kunimoto, Esq.  
Nevada Bar No. 7781  
Robert J. Cassity, Esq.  
Nevada Bar No. 9779  
9555 Hillwood Drive, 2<sup>nd</sup> Floor  
Las Vegas, NV 89134

Andrew Z. Weaver, Esq. (pro hac vice)  
Michael D. Pegues (pro hac vice)  
POLSINELLI, PC  
1000 Louisiana Street, Suite 6400  
Houston, TX 77002

*Attorneys for Defendants Aruze Gaming  
America, Inc. and Kazuo Okada*

David S. Krakoff (pro hac vice)  
Benjamin B. Klubes (pro hac vice)  
Lauren R. Randell (pro hac vice)  
Adam Miller (pro hac vice)  
BUCKLEY LLP  
2001 M Street NW, Suite 500  
Washington, DC 20036

Jeffrey S. Love (pro hac vice)  
Kristin L. Cleveland (pro hac vice)  
Klarquist Sparkman, LLP  
121 SW Salmon St., Ste. 1600  
Portland, OR 97204

*Attorneys for Defendant Aruze Gaming  
America, Inc.*

*Attorneys for Plaintiff/Counter-  
Defendants*

IT IS SO ORDERED:



RICHARD F. BOULWARE, II  
United States District Judge

DATED this 25th day of November, 2020.

1 *Universal Entertainment Corporation v. Aruze Gaming America, Inc., et al.*  
2 *Case No. 2:18-cv-00585-RFB-NJK*

3 *Stipulation and Order to Extend Time For Plaintiff to Produce Documents Required by the Court's*  
4 *Order Dated September 1, 2020 (ECF No. 223)*  
5 *(First Request)*

6 **ORDER**

7 **IT IS SO ORDERED.**

8  
9 \_\_\_\_\_  
10 UNITED STATES DISTRICT COURT JUDGE/  
11 UNITED STATES MAGISTRATE JUDGE

12 DATED: \_\_\_\_\_

13 Case No.: 2:18-CV-00585-RFB-NJK  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28