

CHRISTENSEN JAMES & MARTIN, CHTD.
7440 WEST SAHARA AVE., LAS VEGAS, NEVADA 89117
PH: (702) 255-1718 § FAX: (702) 255-0871

1 **CHRISTENSEN JAMES & MARTIN, CHTD.**
Kevin B. Christensen, Esq. (175)
2 Wesley J. Smith, Esq. (11871)
Kevin B. Archibald, Esq. (13817)
3 7440 W. Sahara Avenue
Las Vegas, Nevada 89117
4 Telephone: (702) 255-1718
Facsimile: (702) 255-0871
5 kbc@cjmlv.com, wes@cjmlv.com, kba@cjmlv.com
6 *Attorneys for Plaintiffs Board of Trustees*
of the Glaziers Joint Trust Funds, et al.

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 * * * * *

10 BOARD OF TRUSTEES OF THE
11 GLAZIERS JOINT TRUST FUNDS;
INTERNATIONAL UNION OF
12 PAINTERS AND ALLIED TRADES,
DISTRICT COUNCIL 15, GLAZIERS,
13 ARCHITECTURAL METAL AND
GLASSWORKERS' LOCAL UNION
14 2001

CASE NO.: 2:18-cv-00598-JCM-CWH

**STIPULATION AND ORDER
TO EXTEND DEADLINE FOR
SERVICE OF PROCESS**

15 Plaintiffs,

16 vs.

Date: N/A
Time: N/A

17 M-CORE CONSTRUCTION, LLC, A
New Mexico limited liability company;
18 MGM GRAND HOTEL LLC dba MGM
GRAND HOTEL AND CASINO, a
19 Nevada limited liability company; MGM
RESORTS INTERNATIONAL dba
20 MGM RESORTS INTERNATIONAL
DESIGN, a Delaware corporation; MGP
21 LESSOR, LLC, a Delaware limited
22 liability company; JOHN DOES I-XX,
inclusive; and ROE ENTITIES I-XX,
23 inclusive,

24 Defendants.

25 Plaintiffs Board of Trustees of the Glaziers Joint Trust Funds ("Trusts") and
26 International Union of Painters and Allied Trades, District Council 15, Glaziers,
27 Architectural Metal and Glassworkers' Local Union 2001 ("Union") (Trusts and Union
28

1 collectively the "Plaintiffs"), by and through their counsel, Christensen James & Martin,
2 Chtd., and Defendant M-Core Construction, LLC ("M-Core"), by and through its
3 counsel, Kamer Zucker Abbott, hereby stipulate and agree as follows:

4
5 1. Plaintiffs and M-Core have reached settlement terms that will fully resolve
6 all issues in this Case, including the claims asserted by the Plaintiffs against the other
7 Defendants (MGM Grand Hotel LLC dba MGM Grand Hotel and Casino; MGM Resorts
8 International dba MGM Resorts International Design; and MGP Lessor, LLC). The
9 Parties are currently working on settlement documents which they believe will be
10 completed and executed within the next thirty days.

11 2. The settlement documents will require performance of certain actions on
12 or before August 11, 2018. Upon completion of those actions, the Parties intend that the
13 entire case be dismissed with prejudice.

14 3. The deadline for submitting proof of service of process is July 2, 2018.

15 4. Given the settlement and the time needed to complete the actions required
16 thereunder, the Parties stipulate and respectfully request that the deadline for submitting
17 proof of service of process be extended by forty-five days to August 16, 2018.

18 DATED this 28th day of June, 2018.

19 CHRISTENSEN JAMES & MARTIN

KAMER ZUCKER ABBOTT

20 By: /s/ Wesley J. Smith
21 Wesley J. Smith, Esq.
22 Nevada Bar No. 11871
23 Email: wes@cjmlv.com
24 *Attorneys for Plaintiffs Board of
Trustees of the of the Glaziers Joint
Trust Funds, et al.*

By: /s/ R. Todd Creer
R. Todd Creer, Esq.
Nevada Bar No. 10016
Email: tcreer@kzalaw.com
Attorneys for M-Core Construction, LLC

25 IT IS SO ORDERED.

26 
UNITED STATES MAGISTRATE JUDGE

27 Date: July 2, 2018

CERTIFICATE OF SERVICE

I am an employee of Christensen James & Martin. On the date of filing the foregoing papers with the Clerk of Court, I caused a true and correct copy to be served in the following manner:

ELECTRONIC SERVICE: Pursuant to Local Rule LR IC 4-1 of the United States District Court for the District of Nevada, the above-referenced document was electronically filed and served on all appearing parties through the Notice of Electronic Filing automatically generated by the Court.

UNITED STATES MAIL: By depositing a true and correct copy of the above-referenced document into the United States Mail with prepaid first-class postage, addressed to the parties at their last-known mailing address(es):

OVERNIGHT COURIER: By depositing a true and correct copy of the above-referenced document for overnight delivery via a nationally-recognized courier, addressed to the parties listed below which was incorporated by reference and made final in the w at their last-known mailing address.

ELECTRONIC MAIL: By sending the above-referenced document via electronic mail to those persons and those addresses listed below:

CHRISTENSEN JAMES & MARTIN

By: /s/ Natalie Saville