

1 KAMER ZUCKER ABBOTT
 Jen J. Sarafina #9679
 2 Dare E. Heisterman #14060
 3000 W. Charleston Boulevard, Suite 3
 Las Vegas, Nevada 89102-1990
 3 Tel. (702) 259-8640
 Fax (702) 259-8646
 4 jsarafina@kzalaw.com
 dheisterman@kzalaw.com

5 Attorneys for Defendant
 6 Wynn Las Vegas, LLC

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

9	VINCENT FRIED,)	Case No. 2:18-cv-00689-APG-BNW
)	
10	Plaintiff,)	
)	
11	vs.)	<u>STIPULATION AND REQUEST TO</u>
)	<u>EXTEND DEADLINE TO SUBMIT</u>
)	<u>JOINT PRETRIAL ORDER</u>
12	WYNN LAS VEGAS, LLC, a Nevada limited)	
	liability company,)	<u>(First Request)</u>
13	Defendant.)	
)	

14

15 Plaintiff Vincent Fried (“Plaintiff), by and through his counsel of record, Michael P. Balaban
 16 Esq., and Defendant Wynn Las Vegas, LLC, (“Defendant” or “Wynn”), by and through its counsel
 17 of record, the law firm Kamer Zucker Abbott (collectively the “Parties”), stipulate and request that
 18 the Court extend the deadline to submit the Joint Pretrial Order by forty-five (45) days, up to and
 19 including June 9, 2022. In support of this Stipulation and Request, the parties state as follows:

- 20 1. The Joint Pretrial Order deadline is currently set for April 25, 2022. See ECF No. 47.
 21 2. On March 31, 2022, the parties first discussed the possibility of settlement. Those
 22 discussions continued April 6, 8, 11, 15, and 21, and the parties are continuing their
 23 discussions.
 24

3. This Request for an extension of time is not sought for any improper purpose or other purpose of delay. Rather, it is sought by the parties solely for the purpose of continuing settlement discussions and to finalize any settlement. If the parties are unable to reach resolution, the extension will allow the parties time to confer and draft the Joint Pretrial Order.

WHEREFORE, the parties respectfully request that the Court extend the deadline for the parties to submit the Joint Pretrial Order up to and including June 9, 2022.

DATED this 22nd day of April, 2022.

DATED this 22nd day of April, 2022.

/s/ Michael P. Balaban

Michael P. Balaban #9370
Law Offices of Michael P. Balaban
10726 Del Rudini Street
Las Vegas, Nevada 89141
Telephone: (702) 586-2964
Facsimile: (702) 586-3023

Attorney for Plaintiff,
Vincent Fried

/s/ Jen J. Sarafina

Jen J. Sarafina #9679
Dare E. Heisterman #14060
KAMER ZUCKER ABBOTT
3000 West Charleston Boulevard, Suite 3
Las Vegas, NV 89102
Telephone: (702) 259-8640
Facsimile: (702) 259-8646

Attorneys for Defendant,
Wynn Las Vegas, LLC

IT IS SO ORDERED.

Dated: April 25, 2022



UNITED STATES DISTRICT COURT JUDGE