

1 LEON GREENBERG, ESQ., SBN 8094  
 2 DANA SNIEGOCKI, ESQ., SBN 11715  
 3 Leon Greenberg Professional Corporation  
 4 2965 South Jones Blvd- Suite E3  
 5 Las Vegas, Nevada 89146  
 6 Tel (702) 383-6085  
 7 Fax (702) 385-1827  
 8 leongreenberg@overtimelaw.com  
 9 dana@overtimelaw.com

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

9 MICHAEL RENO and ERIC KIEFABER,  
 10 Individually and on behalf of others similarly  
 11 situated,

CASE NO.: 2:18-cv-840-APG-NJK

11 Plaintiff,

**STIPULATION AND ORDER TO  
 12 EXTEND PLAINTIFFS' TIME TO  
 13 FILE A RESPONSE IN OPPOSITION  
 14 TO DEFENDANTS' MOTION FOR  
 15 SANCTIONS (ECF NO. 21) AND TO  
 16 DEEM MOTIONS TO DISMISS  
 17 APPLICABLE TO FIRST AMENDED  
 18 COMPLAINT  
 19 (FIRST REQUEST)**

12 vs.

13 WESTERN CAB COMPANY, HELEN  
 14 TOBMAN MARTIN, MARILYN TOBMAN  
 15 MORAN, JANIE TOBMAN MOORE,  
 16 MARTHA SARVER, JASON AWAD and  
 17 "John Does" name fictitious, actual name and  
 18 number unknown, et al.,

17 Defendants.

19 Plaintiffs Michael Reno and Eric Kiefaber ("Plaintiffs") and Defendants Western Cab  
 20 Company, Helen Tobman Martin, Marilyn Tobman Moran, Janie Tobman Moore, and Martha  
 21 Sarver ("these Defendants"), through their counsel of record, hereby stipulate and agree to an  
 22 extension of time for Plaintiffs to file their response to these Defendants' motion for sanctions,  
 23 ECF No. 21. Such motion was filed on August 9, 2018, with a response in opposition being due  
 24 on August 23, 2018. The parties agree Plaintiffs will have until **September 13, 2018** to file their  
 25 response in opposition to this motion.  
 26  
 27

28 The parties further stipulate and agree that these Defendants' Motions to Dismiss (ECF  
 Nos. 9 and 10), the Opposition (ECF No. 20) and the Reply (ECF No. 22) shall be deemed to

1 apply to the First Amended Complaint filed by plaintiffs on August 1, 2018 (ECF No. 17). The  
2 parties agree that the briefing on the motions to dismiss the First Amended Complaint is  
3 complete and the motions to dismiss are ready for the Court's decision.

4 The extension requested herein is made in good faith and not for purposes of delay.

5  
6  
7 Dated August 13, 2018

Dated August 13, 2018

8 Respectfully submitted,

Respectfully submitted,

9 /s/ Dana Sniegocki

/s/ Malani Kotchka

10 LEON GREENBERG, ESQ.  
11 DANA SNIEGOCKI, ESQ.  
12 LEON GREENBERG  
13 PROFESSIONAL CORPORATION  
14 2965 South Jones Blvd., #E3  
Las Vegas, NV 89146  
Tel (702) 383-6085  
Fax (702) 385-1827  
Attorneys for Plaintiffs

MALANI KOTCHKA, ESQ.  
HEJMANOWSKI & McCREA LLC  
520 South Fourth Street  
Suite 320  
Las Vegas, NV 89101  
Attorneys for Defendants  
Western Cab Company, Helen Tobman Martin,  
Marilyn Tobman Moran, Janie Tobman Moore,  
and Martha Sarver

15  
16  
17 IT IS SO ORDERED:

18 

19 UNITED STATES DISTRICT JUDGE

20 Dated: August 13, 2018.