

1 LEON GREENBERG, ESQ., SBN 8094
 2 RUTHANN DEVEREAUX-GONZALEZ, ESQ., SBN 15904
 3 Leon Greenberg Professional Corporation
 4 1811 South Rainbow Blvd- Suite 210
 5 Las Vegas, Nevada 89146
 6 Tel (702) 383-6085
 7 Fax (702) 385-1827
 8 leongreenberg@overtimelaw.com
 9 ranni@overtimelaw.com

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

9 MICHAEL RENO, ERIC KIEFABER,
 10 DENNIS RHOADES, JASON HARRIS,
 11 PREMIER TAMAYO, WILFREDO
 12 ALLANIGUE and ARIES BIHASA,
 13 Individually and on behalf of others similarly
 14 situated,

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

**STIPULATION AND ORDER
 EXTENDING DEADLINES**

Plaintiff,

vs.

14 WESTERN CAB COMPANY, HELEN
 15 TOBMAN MARTIN, MARILYN TOBMAN
 16 MORAN, JANIE TOBMAN MOORE,
 17 MARTHA SARVER and JASON AWAD,

Defendants.

18
 19 Plaintiffs Michael Reno, Eric Kiefaber, Dennis Rhoades, Jason Harris, Premier Tamayo,
 20 Wilfredo Allanigue and Aries Bihasa (“Plaintiffs”) and Defendants Western Cab Company,
 21 Helen Tobman Martin, Marilyn Tobman Moran, Janie Tobman Moore, Marther Sarver and Jason
 22 Awad, (“Defendants”), through their counsel of record, hereby stipulate and agree as follows:

23 1. On February 23, 2024, the Court issued its Order (ECF 382) extending the
 24 remaining pre-trial scheduling deadlines in this case. That Order extended the dispositive motion
 25 deadline to April 29, 2024, and the trial brief deadline to May 27, 2024. ECF 382.
 26
 27
 28

1 2. Subsequent to the Court’s ECF 382 Order, the Court Ordered the defendant
2 Western Cab to appear for a limited Rule 30(b)(6) deposition no later than March 31, 2024. ECF
3 386. That deposition is taking place on March 28, 2024, at 2pm.

4 3. The plaintiffs assert they need time to receive the transcript of that deposition and
5 to determine the impact of the testimony given during that deposition on any dispositive motions.
6

7 4. Accordingly, the parties hereby stipulate and agree that the deadline for
8 dispositive motions shall be extended by sixty (60) days and will be due on June 29, 2024, and
9 the trial brief will be continued to July 26, 2024 or 30 days after the rendering of any decision on
10 dispositive motions, if any such motions are filed.

11 5. This request is not made for the purpose of delay.
12

13 Dated March 28, 2024

Dated March 28, 2024

14 Respectfully submitted,

Respectfully submitted,

15
16 /s/ Leon Greenberg
17 LEON GREENBERG, ESQ.
18 LEON GREENBERG
19 PROFESSIONAL CORPORATION
20 1811 South Rainbow Blvd., Suite 210
21 Las Vegas, NV 89146
22 Tel (702) 383-6085
23 Fax (702) 385-1827
24 Attorneys for Plaintiffs

/s/ Mario Lovato
MARIO P. LOVATO
LOVATO LAW FIRM, P.C.
Nevada Bar No. 7427
7465 W. Lake Mead Blvd. Ste. 100
Las Vegas, NV 89128
Attorney for Defendants

25 IT IS SO ORDERED.

26
27 
28 UNITED STATES MAGISTRATE JUDGE
April 2nd, 2024