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14		
15	UNITED STATES DISTRICT COURT	
16	FOR THE DISTRICT OF NEVADA	
17		
18	YVONNE NOSIK	Case No.: 2:18-cv-00972-RFB-VCF
19	Plaintiff,	JOINT STIPULATION TO
20	v.	REQUEST CONTINUANCE OF DEADLINE TO SUBMIT JOINT
21		STATUS REPORT DUE TO
22	ALL BRIGHT FAMILY DENTISTRY, LLC dba ALL BRIGHT DENTAL, a	PLAINTIFF'S INTENDED CHANGE OF COUNSEL AND
23	Nevada Limited Liability Company	PROPOSED ORDER THEREON
24	Defendant.	
25		Action Filed: 5/27/2018
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	JOINT STIPULATION TO REQUEST CONTINUANCE OF DEADLINE & [PROPOSED] ORDER Dockets.Justia	

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## TO THE HONORABLE COURT:

Plaintiff Yvonne A. Nosik ("Plaintiff") and Defendant All Bright Family Dentistry, LLC d/b/a All Bright Dental ("Defendant") (hereafter Plaintiff and Defendant are jointly referred to as the "Parties"), hereby jointly stipulate to respectfully request a brief continuance of the September 12, 2020 deadline to file a Joint Status Report and Proposed Discovery and Scheduling Order. The Parties submit this request because Plaintiff is currently in the process of engaging new counsel to represent her in this case.

## **STIPULATION**

 WHEREAS, on August 12, 2020, the Court denied Plaintiff's Motion to Enforce Settlement and issued an order requiring the parties submit a Joint Status Report and Discovery Plan/Scheduling Order by September 12, 2020.

2. WHEREAS, On September 8, 2020, Plaintiff's counsel Michael Balaban filed a Motion to Withdraw as Plaintiff's Attorney in this case. As of the time of filing this Joint Stipulation and Request, the Court has not ruled on Mr. Balaban's Motion.

3. WHEREAS, On September 11, 2020, Michelle Nisce of Prime Law Group notified Defendant's counsel that Plaintiff intended to engage her to represent Plaintiff in this case. Ms. Nisce and Mr. Balaban informed Defendant's counsel that they intend to file a Stipulation to Substitute Ms. Nisce in as Plaintiff's counsel in this case. As of the time of filing this Joint Stipulation and Request, Plaintiff has not yet filed the Stipulation to Substitute counsel.

4. WHEREAS, Plaintiff's intended new counsel Ms. Nisce indicated that she requires additional time to become Plaintiff's counsel of record and get up to speed on the case before she can engage in meaningful discussions about a proposed Discovery and Scheduling Order.

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WHEREAS, Plaintiff's soon to depart counsel, Mr. Balaban, is unable to 1 5. 2 commit to deadlines in a Discovery and Scheduling Order given that he will not be involved in this case after Ms. Nisce steps in. 3 4 THUS, for the reasons listed above, the Parties jointly respectfully 6. 5 request the Court continue the September 12, 2020 deadline to file a Joint Status 6 Report and Proposed Discovery and Scheduling Order to September 25, 2020. 7 8 **KAEDIAN LLP** LAW OFFICES OF MICHAEL P. BALABAN 9 10 /s/ Michael P. Balaban /s/ Nannina L. Angioni Michael P. Balaban, Esq. Nannina L. Angioni, Esq. 11 3690 Howard Hughes Parkway, Suite 500 10726 Del Rudini St. Las Vegas, NV 89169 Las Vegas, NV 89141 12 Attorney for Plaintiff, Attorney for Defendant, 13 Yvonne Nosik All Bright Family Dentistry Dated: September 12, 2020 Dated: September 12, 2020 14 15 16 ORDER 17 GOOD CAUSE HAVING BEEN SHOWN, the Court continues the September 18 12, 2020 deadline to file a Joint Status Report and Proposed Discovery and 19 Scheduling Order to September 25, 2020. 20 **IT IS SO ORDERED.** 21 Can Back 22 23 Dated: 9-21-2020 24 The Honorable Cam Ferenbach 25 United States Magistrate Judge 26 27 28

JOINT STIPULATION TO REQUEST CONTINUANCE OF DEADLINE & [PROPOSED] ORDER