Gordon Rees Scully Mansukhani, LLP 300 S. 4th Street, Suite 1550 Las Vegas, NV 89101

1	Craig J. Mariam (SBN: 10926) cmariam@grsm.com GORDON REES SCULLY MANSUKHANI, LLP 300 S. 4th Street, Suite 1550 Las Vegas, NV 89101		
2			
3			
4	Telephone: (702) 577-9333 Facsimile: (877) 306-0043		
5	Attorneys For Defendant		
6	NORTHSTAR LOCATION SERVICES, LLC		
7			
8	UNITED STATES DISTRICT COURT		
9	DISTRICT OF NEVADA		
10	Janis M. Pappa formally known as Janis M. Suarez,) CASE NO. 2:18-cv-01023-JAD-CWH	
11	Plaintiff,) Honorable Jennifer A. Dorsey	
12	VS.) Magistrate Judge Carl W. Hoffman	
13	Northstar Location Services, LLC) STIPULATION TO EXTEND TIME FOR DEFENDANT NORTHSTAR	
14 15	Defendant.) LOCATION SERVICES, LLC TO) FILE AND SERVE RESPONSIVE) PLEADING TO COMPLAINT 	
15) (First Request)	
10))	
18			
19	TO THIS HONORABLE COURT:		
20	IT IS HEREBY STIPULATED AND AGREED, by and between Craig J. Mariam, Esq.,		
21	of the law firm Gordon Rees Scully Mansukhani LLP, attorneys for defendant Northstar		
22	Location Services, LLC, and Michael Kind, Esq., of the law firm Kazerouni Law Group, APC,		
23	attorneys for plaintiff Janis M. Pappa, that the date for defendant Northstar Location Services,		
24	LLC to file and serve a responsive pleading to plaintiff's Complaint be extended through and		
25	including July 13, 2018. The reason for the request is that counsel for Northstar Location		
26	Services, LLC was only very recently retained, and requires additional time to prepare a		
27	responsive pleading to the Complaint. Additionally, the parties plan to engage in productive		
28	settlement discussions in an effort to avoid further litigation. As such, the parties require		
	-1- STIPULATION TO EXTEND TIME FOR DEFENDANT NORTHSTAR LOCATION SERVICES, LLC TO FILE AND SERVE RESPONSIVE PLEADING TO COMPLAINT		
		Dockets.Justia.co	

additional time to engage in settlement negotiations, in the hopes of avoiding litigation 1 2 altogether. 3 This is the parties' first request for an extension. 4 Respectfully submitted, DATED this 29th of June, 2018 DATED this 29th day of June, 2018 5 6 /s/ Michael Kind /s/ Craig J. Mariam MICHAEL KIND, ESQ. CRAIG J. MARIAM, ESQ. 7 Nevada Bar # 13903 SBN: 10926 KAZEROUNI LAW GROUP, APC GORDON REES SCULLY MANSUKHANI, 8 6069 South Fort Apache Road, Suite 100 LLP Las Vegas, NV 89148 300 S. 4th Street, Suite 1550 9 Attorneys for Plaintiff Las Vegas, NV 89101 Attorneys for Defendant 10 Northstar Location Services, LLC Gordon Rees Scully Mansukhani, LLP 300 S. 4th Street, Suite 1550 Las Vegas, NV 89101 11 ATTESTATION REGARDING SIGNATURES 12 I certify that all signatories listed, and on whose behalf the filing is submitted, concur in 13 14 the filing's content and have authorized the filing. 15 Dated: June 29, 2018 16 /s/ Craig J. Mariam CRAIG J. MARIAM 17 18 **IT IS SO ORDERED.** 19 Dated: July 2, 2018 UNITED STATES MAGISTRATE JUDGE 20 21 22 23 24 25 26 27 28 -2-STIPULATION TO EXTEND TIME FOR DEFENDANT NORTHSTAR LOCATION SERVICES. LLC TO FILE AND SERVE RESPONSIVE PLEADING TO COMPLAINT

	1 2 3 4 5 6 7	Craig J. Mariam (SBN: 10926) cmariam@grsm.com GORDON REES SCULLY MANSUKHANI, LLP 300 S. 4th Street, Suite 1550 Las Vegas, NV 89101 Telephone: (702) 577-9333 Facsimile: (877) 306-0043 Attorneys For Defendant NORTHSTAR LOCATION SERVICES, LLC		
	8	UNITED STATES DISTRICT COURT		
	9	DISTRICT OF NEVADA		
	10	Janis M. Pappa formally known as Janis M. Suarez,) CASE NO. 2:18-cv-01023-JAD-		
ď	11	Plaintiff,) CWH		
Gordon Rees Scully Mansukhani, LLP 101 W. Broadway Suite 2000 San Diego, CA 92101	12	vs.		
sukhê uite 20 101	13	Northstar Location Services, LLC		
lon Rees Scully Mansukhani, 101 W. Broadway Suite 2000 San Diego, CA 92101	14	Defendant.		
Scully Broad Diego	15	///		
I Rees 1 W. J San	16	PROOF OF SERVICE		
ordon 10	17	I am a resident of the State of California, over the age of eighteen years, and not a party		
G	18	to the within action. One of my business addresses is: Gordon Rees Scully Mansukhani, LLP,		
	19	300 S. 4th Street, Suite 1550, Las Vegas, NV 89101. On June 29, 2018, I served the within		
	20	document:		
	21	1. STIPULATION TO EXTEND TIME FOR DEFENDANT NORTHSTAR LOCATION SERVICES, LLC TO FILE AND SERVE RESPONSIVE PLEADING TO COMPLAINT		
	22			
	23	by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 n m		
	24	by personally delivering the document(s) listed above to the person(s) at the		
	25	address(es) set forth below.		
	26 27	California at San Diago, addrassad as sat forth below.		
	28			
		-1- PROOF OF SERVICE		

II

1 2 3 4	 by placing a true copy thereof enclosed in a sealed envelope, at a station designated for collection and processing of envelopes and packages for overnight delivery by FedEx as part of the ordinary business practices of GORDON REES SCULLY MANSUKHANI, LLP described below, addressed as follows: by placing a true copy thereof enclosed in a sealed envelope, at a station designated for collection and processing of envelopes and packages for overnight delivery by Express Mail by U.S. post office as part of the ordinary business practices of 	
5	GORDON REES SCULLY MANSUKHANI, LLP described below, addressed as follows:	
6 7 8	☑ BY ELECTRONIC FILING. I hereby certify that on June 29, 2018, a copy of the foregoing documents were filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's electronic filing system.	
9	Michael Kind Attorneys for Plaintiff KAZEROUNI LAW GROUP, APC	
10	6069 S. Fort Apache Rd., Suite 100 Las Vegas, NV 89148	
11	Tel: (800) 400-6808 x7 Fax: (800) 520-5523	
12	mkind@kazlg.com	
13	David H. Krieger HAINES & KRIEGER, LLC	
14	8985 S. Eastern Avenue Suite 350 Henderson, NV 89123	
15 16	Tel: (702) 880-5554 Fax: (702) 385-5518 dkrieger@hainesandkrieger.com	
10		
18	I am readily familiar with the firm's practice of collection and processing correspondence	
19	for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same	
20	day with postage thereon fully prepaid in the ordinary course of business. I am aware that on	
21	motion of the party served, service is presumed invalid if postal cancellation date or postage	
22	meter date is more than one day after the date of deposit for mailing in affidavit.	
23	I declare under penalty of perjury under the laws of the United States of America that the	
24	above is true and correct.	
25	Executed on June 29, 2018.	
26	Jeanne P. Farrar	
27		
28		
	-2- PROOF OF SERVICE	

Gordon Rees Scully Mansukhani, LLP 101 W. Broadway Suite 2000 San Diego, CA 92101