

1 MARK E. FERRARIO
 Nevada Bar No. 1625
 2 JASON K. HICKS
 Nevada Bar No. 13149
 3 **GREENBERG TRAUERIG, LLP**
 10845 Griffith Peak Drive, Suite 600
 4 Las Vegas, Nevada 89135
 Telephone: (702) 792-3773
 5 Fax: (702) 792-9002
 Email: ferrariom@gtlaw.com
 6 hicksja@gtlaw.com

7 *Attorneys for Dana Dorado*

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

11 SANDRA M. MEZA-PEREZ, an individual,
 12 Plaintiff,

13 v.

14 SBARRO LLC dba SBARRO PIZZA, a
 foreign limited liability company; SBARRO,
 15 INC. dba SBARRO PIZZA, a foreign
 corporation; ZACHARY CEBALLES, an
 16 individual; EFRAIN HERNANDEZ, an
 individual; JESUS ALATORRE, an
 17 individual; DANA DORADO, an individual,
 18 Defendants.

Case No.: 2:19-cv-373-APG-NJK

**STIPULATION AND ~~PROPOSED~~
 ORDER EXTENDING TIME FOR DANA
 DORADO TO SUBMIT HER REPLY IN
 SUPPORT OF HER MOTION FOR
 ATTORNEY’S FEES AND COSTS
 PURSUANT TO THE COURT’S ORDER
 GRANTING RULE 11 SANCTIONS
 AGAINST PLAINTIFF’S COUNSEL [ECF
 180]**

(First Request)

20 IT IS HEREBY STIPULATED AND REQUESTED by and between Plaintiff’s counsel
 21 Melanie Hill and Hardeep Sull on the one hand and Dana Dorado on the other, through their
 22 respective counsel and pursuant to Local Rules IA 6-1, LR IA 6-2, and LR 7-1, that the Court extend
 23 the deadline for Ms. Dorado to submit her Reply in support of her Motion for Attorney’s Fees and
 24 Costs Pursuant to the Court’s Order Granting Rule 11 Sanctions (the “Motion”), up to, and
 25 including, **January 20, 2021**. This stipulation is made and based upon the following:

- 26 1. On September 30, 2020, the Court entered an order granting Ms. Dorado’s Motion
 27 for Sanctions under Rule 11. ECF No. 177.

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 (702) 792-9002 (fax)

1 2. That order directed Ms. Hill, Ms. Sull, and Ms. Dorado to confer about the amount
2 of fees and costs to be awarded pursuant to that order and, if they could not agree, to brief the matter
3 for the Court.

4 3. The parties were unable to agree on the amount of costs and fees to be awarded
5 therefore Ms. Dorado submitted the Motion on November 30, 2020.

6 4. By stipulation, Ms. Hill and Ms. Sull submitted their opposition to the Motion on
7 January 4, 2021.

8 5. Ms. Dorado’s reply is currently due on January 11, 2021.

9 6. Ms. Hill, Ms. Sull, and Ms. Dorado agree and request that Ms. Dorado have up to,
10 and including, **January 20, 2021**, to file her reply in support of the Motion. This request is made
11 in order to accommodate competing obligations held by Ms. Dorado’s counsel and agreed to by
12 Ms. Hill’s and Ms. Sull’s counsel as a professional courtesy.

13 7. This is the first request for the relief sought herein, made in good faith and not for
14 purposes of delay.

15 Dated this 8th day of January 2021.

Dated this 8th day of January 2021.

16 /s/ Joseph Garin
17 JOSEPH P. GARIN, ESQ.
18 Nevada Bar No. 6653
19 **LIPSON NEILSON P.C.**
990 Covington Cross Dr., Suite 120
Las Vegas, NV 89144

/s/ Jason K. Hicks
MARK E. FERRARIO, ESQ.
Nevada Bar No. 1625
JASON K. HICKS, ESQ.
Nevada Bar No. 13149
GREENBERG TRAUERIG, LLP
10845 Griffith Peak Drive, Suite 600
Las Vegas, NV 89135

20 *Counsel for Melanie Hill and Hardeep Sull*

Counsel for Dana Dorado

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE

Dated this 8th day of January 2021.

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