

Lipson Neilson P.C.
9900 Covington Cross Drive, Suite 120
Las Vegas, Nevada 89144
(702) 382-1500 FAX: (702) 382-1512

1 LIPSON NEILSON P.C.
2 JOSEPH P. GARIN, ESQ.
3 Nevada Bar No. 6653
4 9900 Covington Cross Drive, Suite 120
5 Las Vegas, Nevada 89144
6 (702) 382-1500 - Telephone
7 (702) 382-1512 - Facsimile
8 jgarin@lipsonneilson.com

9 *Attorneys for Melanie Hill and Hardeep Sull,*
10 *Plaintiff's Counsel*

11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 SANDAR M. MESA-PEREZ, an individual,
14
15 Plaintiff,

16 v.

17 SBARRO LLC dba SBARRO PIZZA, a foreign
18 limited liability company; SBARRO, INC. dba
19 SBARRO PIZZA, a foreign corporation;
20 ZACHARY CEBALLES, and individual;
21 EFRAIN HERNANDEZ, an individual; JESUS
22 ALATORRE, an individual; DANA DORADO,
23 an individual,
24
25 Defendants.

CASE NO. 2:19-cv-373-APG-NJK

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE
OPPOSITION TO DANA DORADO'S
MOTION FOR RECONSIDERATION
OF THE COURT'S ORDER
DENYING HER MOTION FOR
ATTORNEY'S FEES AND COSTS
(ECF NO. 223)**

26 The parties herein, by and through their attorneys of record, hereby stipulate and
27 agree to the following:

28 1. On November 30, 2020, former Defendant Dana Dorado, through her
attorneys, filed Motion for Attorney's Fees and Costs Pursuant to the Court's Order
Granting Rule 11 Sanctions Against Plaintiff's Counsel ("Motion for Attorney's Fees and
Costs") [ECF No. 180].

2. On January 4, 2021, Melanie Hill, Esq. and Hardeep Sull, Esq., by and
through their undersigned counsel, filed Response to Defendant Dana Dorado's Motion
for Attorney's Fees and Costs [ECF No. 186].

///
///

1 3. On January 20, 2021, Dana Dorado, through her attorneys, filed Reply in
2 Support of Motion for Attorney’s Fees and Costs Pursuant to the Court’s Order Granting
3 Rule 11 Sanctions Against Plaintiff’s Counsel [ECF No. 194].

4 4. On February 1, 2021, Melanie Hill, Esq. and Hardeep Sull, Esq., by and
5 through their counsel, filed Motion to Strike (and Objection) to Reply and Declarations
6 with New Evidence [ECF Nos. 195].

7 5. On August 16, 2021, the Court filed an Order Denying Motion for
8 Attorneys’ Fees (ECF No. 180) and Motion to Strike (ECF No. 195) [ECF 215].

9 6. On November 4, 2021, Dana Dorado, by and through her counsel, filed
10 Motion for Reconsideration of the Court’s Order Denying Her Motion for Attorney’s Fees
11 and Costs (“Motion for Reconsideration”) [ECF No. 223].

12 7. The Parties hereby agree and stipulate that Melanie Hill, Esq., Melanie Hill
13 Law PLLC, Hardeep Sull, Esq., and Sull & Associates, PLLC shall have an extension
14 from the current due date of November 18, 2021, up to and including **December 13,**
15 **2021** to file their Opposition to Dana Dorado’s Motion for Reconsideration.

16 ///
17 ///
18 ///
19 ///
20 ///
21 ///
22 ///
23 ///
24 ///
25 ///
26 ///
27 ///
28 ///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

8. Thereafter, Dana Dorado shall have up to and including **December 31, 2021** within which to submit her Reply.

9. This stipulation is submitted based upon good cause, and is not made for the purpose of delay.

Dated this 18th day of November, 2021

Dated 18th day of November, 2021

GREENBERG TRAURIG, LLP

LIPSON NEILSON P.C.

/s/ Jason K. Hicks

/s/ Joseph P. Garin

Mark E. Ferrario, Esq.
Jason K. Hicks, Esq.
10845 Griffith Peak Drive, Suite 600
Las Vegas, Nevada 89135
Attorneys for Defendant Dana Dorado

Joseph P. Garin, Esq.
9900 Covington Cross Drive, Suite 120
Las Vegas, Nevada 89144
*Attorneys for Melanie Hill
and Hardeep Sull,
Plaintiff's Counsel*

ORDER

IT IS SO ORDERED.

Dated: November 19, 2021



UNITED STATES DISTRICT COURT JUDGE