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

10 K & K RESIDENTIAL LLC, a Nevada limited
 11 liability company,

12 Plaintiff,

13 vs.

14 UNITED STATES OF AMERICA;
 CENTRAL TELEPHONE COMPANY d/b/a
 15 CENTURYLINK NEVADA, a Delaware
 corporation; DOE individuals I – X, and
 16 ROE entities I – X, inclusive,

17 Defendants.

Case No.: 2:19-cv-426-JAD-NJK

STIPULATION AND ~~PROPOSED~~
ORDER TO STAY ALL CASE-
RELATED DEADLINES

(First Request)

18
 19 Plaintiff K&K Residential LLC (“Plaintiff”) and Defendant Central Telephone Company
 20 d/b/a CenturyLink Nevada (“CenturyLink”), by and through their attorneys of record, hereby
 21 stipulate and request that the Court enter an order staying all case-related deadlines to allow for a
 22 possible early resolution of this case without incurring unnecessary expenses. This stipulation is
 23 made and based upon the following:

24 1. Plaintiff filed its Complaint for quiet title and declaratory relief against CenturyLink
 25 and the United States on March 13, 2019. ECF No. 1. Plaintiff seeks to quiet title to an easement on
 26 a piece of its land that is believed to have been, or currently be, held by the United States,
 27 CenturyLink, or some other third-party. *Id.*

28 2. CenturyLink filed its Answer on April 9, 2019. ECF No. 9.

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1 3. Since then, Plaintiff has been informed by defendant the United States that the United
2 States *might* hold title to the easement. Plaintiff and the United States have been working towards
3 determining whether the United States it does in fact hold title, or whether it transferred it to
4 CenturyLink or some other third-party. In light of this, Plaintiff has given the United States an open
5 extension of time to file its response while they work through the process.

6 4. This necessarily requires Plaintiff to work with representatives from the United States
7 Air Force. Plaintiff is currently cooperating with the Air Force in exchanging documents and
8 otherwise participating in the Air Force’s process.

9 5. Plaintiff is hopeful that the United States does indeed hold title to the easement as the
10 United States has informed Plaintiff it would be willing to relinquish title. However, based upon
11 communications with the Air Force, there exists an air of uncertainty that is yet to be resolved.
12 Plaintiff has been informed by the Air Force that this bureaucratic process takes four to six weeks.

13 6. In light of the fact that Plaintiff and the United States are working to determine
14 ownership of the easement and, if the United States does hold title, resolve this matter, Plaintiff and
15 CenturyLink respectfully request that the Court stay all case-related deadlines to allow for a possible
16 early resolution of this case without incurring unnecessary expenses, and permit Plaintiff and
17 CenturyLink to file a status report in sixty (60) days.

18 7. This is the first request for the relief sought herein, and it is requested in good faith
19 and not for purposes of delay.

20 DATED this 23rd day of May, 2019.

 DATED this 23rd day of May, 2019.

21 **MCDONALD CARANO LLP**

GREENBERG TRAUIG, LLP

22
23 /s/ Matthew Addison
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28 *Attorneys for CenturyLink*

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ORDER

In consideration of the parties' stipulation, and with good cause appearing, IT IS HEREBY ORDERED that all case-related deadlines in this matter are STAYED.

IT IS FURTHER ORDERED that the parties shall file a status report by July 22, 2019.

DATED May 24, 2019



UNITED STATES MAGISTRATE JUDGE