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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

11 TIARE RAMIREZ, an individual;  
12  
13 Plaintiff,  
14 vs.  
15 WYNN LAS VEGAS, LLC; DOES I  
16 through X; and ROE Corporations XI  
17 through XX inclusive,  
18 Defendant.  
19

Case No. 2:19-cv-01174-APG-EJY  
**STIPULATION AND ORDER TO  
EXTEND DEADLINE**  
**(1) TO FILE PLAINTIFF'S  
RESPONSE TO DEFENDANT'S  
MOTION FOR REMITTITUR ECF  
NO. 174 AND MOTION FOR  
SANCTIONS ECF NO. 175**  
**AND**  
**(2) TO FILE DEFENDANT'S  
REPLY THERETO**  
(First Request)

**STIPULATION AND ORDER TO EXTEND DEADLINE (1) TO FILE  
RESPONSE TO DEFENDANT'S MOTION FOR REMITTITUR ECF NO. 174  
AND MOTION FOR SANCTIONS ECF NO. 175 AND (2) TO FILE  
DEFENDANT'S REPLY THERETO**

23 The Parties, by and through their respective attorneys of record, hereby  
24 stipulate that Plaintiff's Response to Defendant's Motion for Remittitur (ECF No.  
25 174) and Motion for Sanctions (ECF No. 175) (together Defendant's "Motion")  
26 shall be extended fourteen (14) days to December 17, 2024. Defendant's Motion  
27 was filed on November 17, 2024 and Plaintiff's Opposition is currently due on  
28 December 3, 2024. See LR 7-2(b). Additionally, the parties further agree that

1 Defendant's Reply thereto shall be due no later than January 15, 2025. This is the  
2 parties' first request for an extension of these deadlines.

3 Good cause supports this request. Lead counsel for Plaintiff had a recent  
4 death in the family requiring his attention. Plaintiff's counsel has additional staffing  
5 issues necessitating the extension. The parties further believe good cause exists  
6 for Defendant's reply to be due by January 15, 2025, as the extended deadline for  
7 the opposition would otherwise require Defendant's reply to be due in the midst of  
8 the holidays conflicting with planned travel and time away from the office.

9 Therefore, Plaintiff's Response to Defendant's Motions, ECF 174 and  
10 175, shall be due no later than Tuesday, December 17, 2024 and Defendant's  
11 Reply thereto shall be due no later than Wednesday, January 15, 2025.

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This stipulation is made in good faith and not for purposes of delay. No party is prejudiced by this stipulation.

**IT IS SO STIPULATED.**

Dated: November 22, 2024

Dated: November 22, 2024

Respectfully submitted,

Respectfully submitted,

*/s/ Christian Gabroy*

*/s/ Wendy M. Krincek*

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Tiara Ramirez*

*Attorneys for Defendant  
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**IT IS SO ORDERED.**



UNITED STATES DISTRICT JUDGE

Dated: November 25, 2024