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Nevada State Bar No. 10902
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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

BRENNA SCHRADER, an individual, on
behalf of herself and all others similarly
situated,

Plaintiff,

vs.

STEPHEN ALAN WYNN; an individual;
MAURICE WOODEN, an individual, WYNN
LAS VEGAS, LLC dba WYNN LAS VEGAS
a Nevada Limited Liability, WYNN
RESORTS, LTD, a Nevada Limited Liability
Company; and DOES 1-20, inclusive; ROE
CORPORATIONS 1-20, inclusive,

Defendants.

Case No. 2:19-cv-02159-JCM-BNW

**STIPULATION TO EXTEND
DEADLINE FOR PLAINTIFF TO FILE
A RESPONSE TO DEFENDANTS'
MOTIONS TO DISMISS**

**(FIRST REQUEST – Response to
Motions to Dismiss)**

IT IS HEREBY STIPULATED by and between Plaintiff, Brenna Schrader, (“Plaintiff”),
through her counsel Burke Huber, at the Richard Harris Law Firm, and Defendants, Wynn Las
Vegas, LLC (“Defendant WLV”) and Wynn Resorts, Ltd. (“Defendant WRL”), through their
counsel Jackson Lewis P.C., Defendant, Stephen Alan Wynn (“Mr. Wynn”), through his counsel
Peterson Baker, PLLC, and Defendant, Maurice Wooden (“Mr. Wooden”), by and through his
counsel Kennedy & Couvillier, (collectively “Defendants”), that Plaintiff shall have an extension
up to and including May 24, 2020 to file a response to motions to dismiss.

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1 This Stipulation is submitted and based upon the following:

2 1. On March 31, 2021, Mr. Wooden and Mr. Wynn filed Motions to Dismiss [ECF
3 Nos. 98, 99].

4 2. On April 7, 2021, Defendants WLW and WRL filed a Partial Motion to Dismiss
5 [ECF No. 90].

6 3. Due to the complexity of the motions filed and Mr. Huber's need to continue home
7 schooling for the time being, Plaintiff respectfully seeks an extension up to and including May 24,
8 2021 to file responses.

9 4. In anticipation of potential Coronavirus obstacles and to avoid the need of filing an
10 additional stipulation, the parties also stipulate the Defendants' Replies to Plaintiff's responses to
11 Defendants' motions to dismiss will be due three weeks later, on June 14, 2021.

12 5. This is the first request for an extension of time for Plaintiff to file a response to
13 Defendants' motions to dismiss, and for an extended period for Defendants' reply briefs.

14 6. This is the first stipulation related to Defendants' replies.

15 7. This request is made in good faith and not for the purpose of delay.

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1 8. Nothing in this Stipulation, nor the fact of entering to the same, shall be construed
2 as waiving any claim and/or defense held by any party.

3 Dated this 21st day of April, 2021.

4 RICHARD HARRIS LAW FIRM

JACKSON LEWIS P.C.

5 /s/ Burke Huber
6 Richard Harris, Bar No. 505
7 Benjamin Cloward, Bar No. 11087
8 Burke Huber, Bar No. 10902
9 801 S. Fourth Street
10 Las Vegas, Nevada 89101
11 *Attorney for Plaintiff*
12 *Brenna Schrader*

/s/ Joshua A. Sliker
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Wynn Las Vegas, LLC and Wynn Resorts,
Ltd.

13 KENNEDY & COUVILLIER

PETERSON BAKER, PLLC

14 /s/ Maximiliano Couvillier
15 Maximiliano D. Couvillier, Bar No. 7661
16 3271 E. Warm Springs Road
17 Las Vegas, Nevada 89120
18 *Attorney for Defendant*
19 *Maurice Wooden*

/s/ Tamara Beatty Peterson
Tamara Beatty Peterson, Bar No. 5218
701 S. 7th Street
Las Vegas, Nevada 89101
Attorney for Defendant
Stephen Alan Wynn

20 **ORDER**

21 IT IS SO ORDERED:

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24 UNITED STATES DISTRICT JUDGE

25 Dated: April 26, 2021
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