

KRISTINA WILDEVELD ASSOCIATES  
550 E CHARLESTON BOULEVARD, SUITE A  
(702) 222-0007 · FAX: (702) 222-0001  
LAS VEGAS, NEVADA 89104  
WWW.WILDELDLAW.COM

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LISA A. RASMUSSEN, ESQ.  
Nevada Bar No.7491  
THE LAW OFFICES OF KRISTINA  
WILDEVELD & ASSOCIATES  
550 E. Charleston Blvd., Suite A  
Las Vegas, NV 89104  
Phone (702) 222-0007  
Fax (702) 222-0001

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

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YESSICA ORTIZ, )  
 ) CASE NO. 2:20-cv-1816 APG-BNW  
Plaintiff, )  
 )  
vs. ) **STIPULATION AND ORDER**  
 )  
SONORAN BARBEQUE NEVADA, )  
LLC; BERTHA LOREA ZAPEDA )  
 )  
Defendant. )

COME NOW the parties, Yessica Ortiz, by and through her counsel, Lisa A. Rasmussen, Esq. and Bertha Lorea Zapeda, by and through her counsel, Troy A. Clark, Esq. and hereby stipulate as follows:

1. This matter was filed in the Eighth Judicial District Court in July 2020.
2. Ms. Lorea Zapeda was served with a copy of the Complaint and Summons in September 2020.
3. On September 30, 2020, her counsel removed the matter to this Court. [ECF 1.] Ms. Lorea Zapeda’s Statement of Removal was also filed on September 30, 2020. [ECF 5.]
4. Ms. Lorea Zapeda also filed a Motion to Dismiss the Complaint on September 30, 2020. [ECF 6.] A response to Ms. Lorea Zapeda’s Motion is due on today’s date.

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5. On October 1, 2020, this Court issued an Order to Show Cause to the Defendants as to why this matter should not be remanded back to state court based on lack of subject matter jurisdiction. [ECF 8.] The Court set a deadline of on or before October 16, 2020 for a response from the defendants. (Id.)

6. All parties participated in a mediation hearing on October 8, 2020 and they have resolved all claims. Because it takes some time to circulate and execute all of the appropriate settlement documents, the parties are not able to file the agreed upon dismissal documents, which will result in a dismissal with prejudice, on today's date.

7. It would be a waste of resource and unnecessary for Plaintiff to respond to pending Motion to Dismiss and it would also be a waste of resource and unnecessary for the defendants to respond to this Court's Order to Show Cause as the matter will be dismissed shortly.

8. Accordingly, the parties stipulate to extend Plaintiff's deadline to respond to the Motion to Dismiss to November 15, 2020.

9. The parties jointly request that it extend its deadline to respond to the Order to Show Cause until November 15, 2020 for the same reasons, but since it is a deadline set by the Court, they cannot stipulate to move it, but they jointly request that it be moved.

10. This will permit the parties to complete execution of settlement documents and to get their proper dismissal of this action on file in this case.

11. This Stipulation is not made for any purpose of delay, but rather is made in the spirit of judicial economy to spare everyone, including the court, any additional unnecessary effort in this matter.

IT IS SO STIPULATED.

Dated this 14<sup>th</sup> day of October, 2020.

**Wildeveld & Associates,**

**Resnick & Louis, P.C.**

*/s/ Lisa A. Rasmussen*

*/s/ Troy A. Clark*

\_\_\_\_\_  
LISA A. RASMUSSEN, ESQ.  
NV Bar No. 7491  
Counsel for Plaintiff

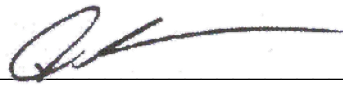
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TROY A. CLARK, ESQ.  
NV Bar No. 11361  
Counsel for Defendants

**ORDER**

1  
2 Upon the Stipulation of the parties, and good cause appearing,  
3 IT IS HEREBY ORDERED that the Plaintiff's deadline to respond to Lorea Zapeda's  
4 Motion to Dismiss is hereby extended to November 15, 2020.

5 IT IS FURTHER ORDERED that the Defendants' deadline to respond to this Court's  
6 Order to Show Cause [ECF 8] is hereby extended to November 15, 2020.

7 Dated: October 15, 2020

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9 \_\_\_\_\_  
10 The Honorable Andrew P. Gordon  
11 United States District Judge

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