

1 JENNY L. FOLEY, Ph.D., ESQ.
2 Nevada Bar No. 9017
3 E-mail: jfoley@hkm.com
4 **SARA SCHREIBER, ESQ.**
5 Nevada Bar No. 15320
6 E-mail: sischreiber@hkm.com
7 **MICHAEL ARATA, ESQ.**
8 Nevada Bar No. 11902
9 E-mail: marata@hkm.com
10 **HKM EMPLOYMENT ATTORNEYS LLP**
11 101 Convention Center Drive, Suite 600
12 Las Vegas, Nevada 89109
13 Tel: (702) 805-8340
14 Fax: (702) 805-8340
15 *Attorneys for Plaintiff*

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

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ERIN ALLEN, an Individual,
Plaintiff,

vs.

VOCATUS, LLC, a Nevada Limited
Liability Company; SHAMOUN'S, LLC, a
Nevada Limited Liability Company, DOES
1-50, inclusive and ROE CORPORATIONS
1-50, inclusive,

Defendant.

CASE NO.: 2:21-cv-00377-APG-DJA

STIPULATION AND ORDER TO
EXTEND TIME FOR PLAINTIFF ERIN
ALLEN TO FILE RESPONSE TO
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT

Plaintiff Erin Allen ("Allen"), and Defendants Vocatus, LLC and Shamoun's, LLC (together "Defendants"), by and through their respective attorneys of record, stipulate as follows:

1. On May 4, 2022, Defendants filed their Motion for Summary Judgment. [ECF No. 35].

2. On May 25, 2022, Plaintiff, through her prior counsel, filed a Motion to Extend Time to Respond to Motion for Summary Judgment [ECF No. 36], to which Defendants responded the same day. [ECF No. 37].

**STIPULATION AND ORDER TO EXTEND TIME FOR PLAINTIFF ERIN ALLEN TO FILE RESPONSE
TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

1 3. On May 31, 2022, Plaintiff's prior counsel, Trevor Hatfield, Esq., moved to
2 withdraw as counsel for Plaintiff. [ECF No. 38].

3 4. On June 2, 2022, Defendants filed their response to the motion to withdraw.
4 [ECF No. 40].

5 5. On June 3, 2022, this Court denied Mr. Hatfield's motion to withdraw as
6 Plaintiff's counsel without prejudice and permitted Mr. Hatfield until June 17, 2022, to file a
7 corrected motion to withdraw. [ECF No. 41].

8 6. On June 16, 2022, Mr. Hatfield filed a renewed motion to withdraw as counsel
9 for Plaintiff. [ECF No. 42].

10 7. Defendants filed their notice of non-opposition to the motion to withdraw on
11 June 20, 2022. [ECF No. 43].

12 8. On June 28, 2022, this Court granted Plaintiff's prior counsel's motion to
13 withdraw and ordered that Plaintiff: (1) shall have until July 13, 2022, to retain new counsel or
14 inform the Court whether she will proceed pro se; and (2) shall have until August 3, 2022, to
15 respond to Defendants' Motion for Summary Judgment. [ECF No. 44].

16 9. On July 18, 2022, Plaintiff's new counsel of record, HKM Employment
17 Attorneys LLP, appeared on Plaintiff's behalf. [ECF No. 45].

18 10. On July 28, 2022, Plaintiff's new counsel, HKM Employment Attorneys LLP,
19 received Plaintiff's file from her prior counsel.

20 11. The parties hereby stipulate and agree Plaintiff shall have fourteen (14)
21 additional days to file her response to Defendants' Motion for Summary Judgment. The new
22 deadline for Plaintiff to file her response shall be August 17, 2022.

23 ///

24 ///

25 ///

26 ///

27 ///

28 **STIPULATION AND ORDER TO EXTEND TIME FOR PLAINTIFF ERIN ALLEN TO FILE RESPONSE
TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

1 12. This is the second request for an extension of this deadline and is not made for
2 purposes of undue delay.

3 Dated: August 1, 2022.

4 **HKM EMPLOYMENT ATTORNEYS, LLP OGLETREE, DEAKINS, NASH, SMOAK**
5 **&STEWART, P.C.**

6 */s/ Jenny L. Foley*

7 **JENNY L. FOLEY, Ph.D., ESQ.**

8 Nevada Bar No. 9017

9 E-mail: jfoley@hkm.com

10 **SARA SCHREIBER, ESQ.**

11 Nevada Bar No. 15320

12 E-mail: sischreiber@hkm.com

13 **MICHAEL ARATA, ESQ.**

14 Nevada Bar No. 11902

15 E-mail: marata@hkm.com

16 101 Convention Center Drive, Suite 600

17 Las Vegas, Nevada 89109

18 Tel: (702) 805-8340

19 Fax: (702) 805-8340

20 *Attorneys for Plaintiff*

6 */s/ Suzanne L. Martin*

7 **SUZANNE L. MARTIN, ESQ.**

8 Nevada Bar No. 8833

9 E-mail: suzanne.martin@ogletree.com

10 **MICHELLE C. KRAKORA, ESQ.**

11 Nevada Bar No. 8832

12 E-mail:

13 [michelle.krakora@ogletreedeakins.com](mailto: michelle.krakora@ogletreedeakins.com)

14 10801 W. Charleston Blvd., Suite 500

15 Las Vegas, Nevada 89135

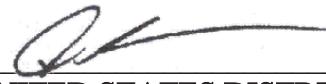
16 Tel: (702) 369-6800

17 Fax: (702) 369-6888

18 *Attorneys for Defendants Vocatus, LLC and
19 Shamoun's, LLC*

20 **ORDER**

21 **IT IS SO ORDERED:**

22 
23 **UNITED STATES DISTRICT COURT JUDGE**
24 CASE NO.: 2:21-cv-00377-APG-DJA

25 **DATED: August 2, 2022**

26 **STIPULATION AND ORDER TO EXTEND TIME FOR PLAINTIFF ERIN ALLEN TO FILE RESPONSE**
27 **TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**