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

11 ERIN ALLEN, an Individual,  
12  
13 Plaintiff,

14 vs.

15 VOCATUS, LLC, a Nevada Limited  
Liability Company; SHAMOUN’S, LLC, a  
16 Nevada Limited Liability Company, DOES  
1-50, inclusive and ROE CORPORATIONS  
17 1-50, inclusive,  
18 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**

19  
20 Plaintiff Erin Allen (“Allen”), and Defendants Vocatus, LLC and Shamoun’s, LLC  
21 (together “Defendants”), by and through their respective attorneys of record, stipulate as  
22 follows:

- 23 1. On May 4, 2022, Defendants filed their Motion for Summary Judgment. [ECF  
24 No. 35].
- 25 2. On May 25, 2022, Plaintiff, through her prior counsel, filed a Motion to Extend  
26 Time to Respond to Motion for Summary Judgment [ECF No. 36], to which Defendants  
27 responded the same day. [ECF No. 37].

28 **STIPULATION AND ORDER TO EXTEND TIME FOR PLAINTIFF ERIN ALLEN TO FILE RESPONSE  
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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.

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28       **STIPULATION AND ORDER TO EXTEND TIME FOR PLAINTIFF ERIN ALLEN TO FILE RESPONSE  
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12. This is the second request for an extension of this deadline and is not made for purposes of undue delay.

Dated: August 1, 2022.

**HKM EMPLOYMENT ATTORNEYS, LLP**

**OGLETREE, DEAKINS, NASH, SMOAK  
& STEWART, P.C.**

*/s/ Jenny L. Foley*

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Shamoun's, LLC*

**ORDER**

**IT IS SO ORDERED:**

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

**DATED:** August 2, 2022

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