

1 Ellen Jean Winograd, Esq.
2 Nevada State Bar No. 815
3 **WOODBURN AND WEDGE**
4 6100 Neil Road, Suite 500
5 Reno, Nevada 89511
6 Tel: 775-688-3000
7 ewinograd@woodburnandwedge.com
8 *Attorneys for Defendant, Truckee South, LLC d/b/a*
9 *Club Fortune*
10 Danielle J. Barraza, Esq.
11 Nevada State Bar No. 13822
12 **MAIER GUTIERREZ & ASSOCIATES**
13 8816 Spanish Ridge Avenue
14 Las Vegas, Nevada 89148
15 Tel: 702-629-7900
16 djb@mgalaw.com
17 *Attorneys for Plaintiff Carmela Scafidi*

18 **IN THE UNITED STATES DISTRICT COURT**

19 **FOR THE DISTRICT OF NEVADA**

20 CARMELA SCAFIDI, individually,

21 Case No. 2:21-cv-00411-GMN-EJY

22 Plaintiff,

23 vs.

24 TRUCKEE SOUTH, LLC d/b/a CLUB FORTUNE
25 CASINO, a domestic limited-liability company;
26 KENNETH MARTIN, an individual; DOES I-X; and
27 ROE BUSINESS ENTITIES I-X, inclusive,

28 Defendants.

29 **STIPULATION AND ORDER TO EXTEND DEFENDANT TRUCKEE SOUTH, LLC**
30 **D/B/A CLUB FORTUNE'S TIME TO RESPOND TO PLAINTIFF'S FIRST SET OF REQUESTS FOR**
31 **PRODUCTION OF DOCUMENTS**
32 **(First Request)**

33 Defendant, TRUCKEE SOUTH, LLC d/b/a CLUB FORTUNE CASINO (hereinafter "CLUB
34 FORTUNE"), and Plaintiff, CARMELA SCAFIDI (hereinafter "SCAFIDI"), by and through their respective
35 attorneys of record, hereby stipulate to extend the time for CLUB FORTUNE to respond to SCAFIDI's First
36 Set of Requests for Production of Documents from its current deadline of July 20, 2021 up to and including
37 August 11, 2021.

1 This is the first request for an extension. This request does not constitute a waiver of any claims or
2 defenses of the parties; this request is made in good faith and not for purposes of delay.

3 The undersigned hereby affirm pursuant to NRS 239B.030 that the preceding document does not
4 contain the personal information of any individual.

5 Dated: July 14, 2021.

5 Dated: July 13, 2021.

6 **MAIER GUTIERREZ & ASSOCIATES**

6 **WOODBURN AND WEDGE**

7 By /s/ Danielle J. Barraza
8 Danielle J. Barraza, Esq.
9 Nevada State Bar No. 13822
10 8816 Spanish Ridge Avenue
11 Las Vegas, Nevada 89148
12 Tel: 702-629-7900
13 Fax: 702-629-7925
14 djb@mgalaw.com

15 *Attorneys for Plaintiff Carmela Scafidi*

7 By /s/ Ellen Jean Winograd
8 Ellen Jean Winograd, Esq.
9 Nevada State Bar No. 815
10 6100 Neil Road, Suite 500
11 Reno, Nevada 89511
12 Tel: 775-688-3000
13 Fax: 775-688-3088
14 ewinograd@woodburnandwedge.com

15 *Attorneys for Defendant, Truckee South, LLC d/b/a
16 Club Fortune*

17 Submitted by:

18 Ellen Jean Winograd, Esq.
19 Nevada State Bar No. 815
20 WOODBURN AND WEDGE
21 6100 Neil Road, Suite 500
22 Reno, Nevada 89511
23 Tel: 775-688-3000
24 Fax: 775-688-3088
25 ewinograd@woodburnandwedge.com
26 *Attorneys for Defendant, Truckee South, LLC d/b/a
27 Club Fortune*

28 **IT IS SO ORDERED.**

29 **DATED this 14th day of July, 2021.**

30 
31 Clayton J. Zouchah
32 **UNITED STATES MAGISTRATE JUDGE**