

1 Shan Davis (SBN 9323)  
2 **DAVIS|STIBOR**  
3 10845 Griffith Peak Drive  
4 Second Floor  
5 Las Vegas, NV 89135  
6 Telephone: (702) 718-9940  
7 Facsimile: (702) 933-1464  
8 Email: [shandavis@davisstibor.com](mailto:shandavis@davisstibor.com)  
9 *Attorneys for Plaintiffs*

6  
7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 NAKASH SHOWCASE II, LLC; SG VEGAS  
10 OWNER, LLC; and GC VEGAS RETAIL,  
11 LLC,

12 Plaintiffs,

13 vs.

14 FEDERAL INSURANCE COMPANY; and  
15 ROE COMPANIES I through X, inclusive,

16 Defendants.

Case No.: 2:21-cv-00540-KJD-DJA

**STIPULATION AND ORDER TO  
EXTEND BRIEFING SCHEDULE  
PERTAINING TO DEFENDANT'S  
MOTION TO DISMISS**

17 All parties hereby stipulate and request that the Court enter an order extending the briefing  
18 schedule as it pertains to DEFENDANTS FEDERAL INSURANCE COMPANY ("Defendant"),  
19 Motion to Dismiss (the "Motion"). The parties agree to extend PLAINTIFFS NAKASH  
20 SHOWCASE, II, LLC's; SG VEGAS OWNER, LLC's; and GC VEGAS RETAIL, LLC's time to  
21 respond to the Motion for thirty (30) days, up to May 24, 2021. The parties further agree to extend  
22 Defendant's time to file a Reply by fourteen (14) days, up to June 14, 2021. Good cause exists for  
23 the request, which is stipulated and agreed between the parties as follows:

24 1. On February 10, 2021, Plaintiffs filed their Complaint against Defendant in the  
25 Eighth Judicial District Court, Clark County, Nevada, Case Number A-21-829284-B (the "State  
26 Court Action").

27 2. On April 2, 2021, Defendant filed a Petition for Removal with this Court and the  
28 Eighth Judicial District Court to remove the State Court Action to this Court claiming diversity of  
diversity of citizenship as the grounds thereof. (ECF No. 1).

1           3.       On April 9, 2021, Defendant filed a motion to dismiss Plaintiffs' complaint. (ECF  
2 No. 5)

3           4.       Plaintiffs' response to Defendant's motion to dismiss is due on April 23, 2021.

4           5.       Plaintiffs have provided Defendant with information they believe could defeat  
5 diversity of citizenship jurisdiction, which is the basis of this Court's jurisdiction in this case. The  
6 parties are currently discussing and attempting to resolve the issues of whether there is diversity, and  
7 whether the case should remain with this Court, or be remanded to State Court.

8           6.       While the parties discuss and attempt to resolve the issue of diversity of citizenship in  
9 good faith, they hereby agree and stipulate to extend the time for Plaintiffs to file a response for the  
10 period of thirty (30) days, to May 24, 2021 and the time for Defendant to file a reply for the period  
11 of fourteen (14) days, to June 14, 2021. The parties respectfully request that the court so order.

12 Dated: April 23, 2021.

Dated: April 23, 2021.

13 **DAVIS|STIBOR**

**FORAN GLENNON PALANDECH  
14 PONZI & RUDLOFF**

15 /s/ Shan Davis  
16 Shan Davis (SBN 9323)  
17 10845 Griffith Peak Drive, 2<sup>nd</sup> Floor  
18 Las Vegas, NV 89135  
19 *Attorneys for Plaintiffs*

/s/ Amy M. Samberg  
Amy M. Samberg (SBN 10212)  
Lee H. Gorlin (SBN 13879)  
2200 Paseo Verde Parkway, Ste 280  
Henderson, NV 89052  
*Attorneys for Defendant*

20  
21 **ORDER**

22 IT IS SO ORDERED.

23  
24 DATED this 27th day of April, 2021.

25  
26  
27   
28 UNITED STATES DISTRICT JUDGE