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23 ATTORNEYS FOR PLAINTIFF AND THE PROPOSED CLASS

24 **UNITED STATES DISTRICT COURT**  
25 **DISTRICT OF NEVADA**

26 MAGGIE THOMSON, as representative of a  
27 class of similarly situated persons, and on  
28 behalf of the Caesars Entertainment  
Corporation Savings & Retirement Plan,

Plaintiff,

v.

RUSSELL INVESTMENTS TRUST  
COMPANY, CAESARS HOLDINGS,  
INC., THE PLAN INVESTMENT  
COMMITTEE, and THE 401(K) PLAN  
COMMITTEE.

Defendants.

Case No. 2:21-cv-00961-GMN-BNW

**STIPULATION REGARDING SECOND  
AMENDED COMPLAINT AND  
DEADLINE TO ANSWER OR  
OTHERWISE RESPOND**

**(FIRST REQUEST)**

1 Plaintiff Maggie Thomson, as representative of a class of similarly situated persons, and on  
 2 behalf of the Caesars Entertainment Corporation Savings & Retirement Plan, and Defendants  
 3 Russell Investments Trust Company, Caesars Holdings, Inc., the Plan Investment Committee, and  
 4 the 401(k) Plan Committee (collectively, the “Parties”), by and through their undersigned counsel,  
 5 hereby stipulate and agree that Plaintiff Maggie Thomson, pursuant to Fed. R. Civ. P. 15(a)(1)(B),  
 6 will file a Second Amended Complaint as of right on or before September 20, 2021 in response to  
 7 Defendants’ motions to dismiss. *See Ramirez v. Cty. of San Bernardino*, 806 F.3d 1002, 1006-1007  
 8 (9th Cir. 2015).<sup>1</sup> The Parties further stipulate that the deadline for Defendants to answer or  
 9 otherwise respond to the Second Amended Complaint, which would otherwise be on October 4,  
 10 2021, shall be extended to October 20, 2021. Plaintiff avers that there is good cause to enter into  
 11 this stipulation to allow Plaintiff to address the issues raised in Defendants’ motions, and that this  
 12 stipulation is not made for purposes of delay. This is the first request for an extension of time to  
 13 respond to the anticipated Second Amended Complaint.

14 Accordingly, the Parties request that the Court approve this stipulation and grant Defendants  
 15 until October 20, 2021 to answer or otherwise respond to Plaintiff’s Second Amended Complaint,  
 16 which she will file on or before September 20, 2021. Defendants do not waive any defenses by  
 17 entering into this stipulation.

19 Dated: September 8, 2021

20 NICHOLS KASTER, PLLP

21 /s/ Benjamin J. Bauer

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Dated: September 8, 2021

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28 <sup>1</sup> The parties agree that Plaintiff may only amend her pleading further with the consent of  
 Defendants or the Court’s leave. Fed. R. Civ. P. 15(a)(2).

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29 **Order**

30 **IT IS SO ORDERED**

31 **DATED:** 10:18 am, September 09, 2021

32   
33 **BRENDA WEKSLER**  
34 **UNITED STATES MAGISTRATE JUDGE**