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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)

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

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

Dated: September 8, 2021

Dated: September 8, 2021

NICHOLS KASTER, PLLP

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/s/ Benjamin J. Bauer

/s/ Adam Hosmer-Henner

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¹ 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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25 **Order**

26 **IT IS SO ORDERED**

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

28 

BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE