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*Attorneys for Defendants*  
SHAC, LLC d/b/a SAPPHIRE  
GENTLEMEN'S CLUB; and SHAC MT, LLC

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

CIELO JEAN "CJ" GIBSON, EMMA GLOVER,  
JULIANNE KLAREN, LINA POSADA,  
MELANIE IGLESIAS, SANDRA VALENCIA,  
and VIDA GUERRA,

Plaintiffs,

vs.

SHAC, LLC d/b/a SAPPHIRE GENTLEMEN'S  
CLUB; SHAC MT, LLC,

Defendants.

Case No. 2:21-CV-01160-JCM-VCF

**STIPULATION TO EXTEND  
DEADLINE FOR RESPONSE TO  
COMPLAINT**

**(First Request)**

Pursuant to LR IA 6-1, Plaintiffs Cielo Jean "CJ" Gibson, Emma Glover, Julianne Klaren, Lina Posada, Melanie Iglesias, Sandra Valencia, and Vida Guerra (collectively, "Plaintiffs"), by and through their counsel, and Defendants SHAC, LLC d/b/a Sapphire Gentlemen's Club and SHAC MT, LLC (together, "Defendants"), by and through their counsel, stipulate and agree as follows:

1. On June 17, 2021, Plaintiffs filed their Complaint (ECF No. 1);
2. On July 13, 2021, Defendants (through their counsel) executed Waivers of Service of Summons forms pursuant to Fed. R. Civ. P. 4(d) (ECF Nos. 5-6);
3. Defendants currently have until September 13, 2021 to respond to the Complaint;
4. Plaintiffs are in the process of preparing and filing a First Amended Complaint;
5. The time for Defendants to respond to the Complaint shall be extended to October 13, 2021, to allow time for Plaintiffs to file their First Amended Complaint. Defendants shall then have 14 days following service of the First Amended Complaint within which to respond; and

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1       6.     This is the first stipulation for extension of time for Defendants to respond to the  
2 Complaint, and is sought in good faith and not for purposes of delay.

3       **IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**

4       DATED this 9<sup>th</sup> day of September, 2021.

5       ALVERSON TAYLOR & SANDERS

6       By: /s/ David M. Sexton  
7            KURT R. BONDS (Nv. Bar No. 6228)  
8            DAVID M. SEXTON (Nv. Bar No. 14951)  
9            6605 Grand Montecito Pkwy, Ste. 200  
10           Las Vegas, NV 89149

11           *Attorneys for Plaintiffs*

12       DATED this 9<sup>th</sup> day of September, 2021

13       BAILEY♦KENNEDY

14       By: /s/ Joshua P. Gilmore  
15            JOSHUA P. GILMORE

16           *Attorneys for Defendants*

17       **IT IS SO ORDERED.**



18       \_\_\_\_\_  
19       UNITED STATES MAGISTRATE JUDGE

20       9-9-2021

21       DATED: \_\_\_\_\_

22       BAILEY♦KENNEDY  
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