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Attorneys for Defendants
Unforgettable Coatings, Inc.;
Unforgettable Coatings of Idaho LLC

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JOSE ISMAEL ZUNIGA, on behalf of himself
and all others similarly situated,

Plaintiff,

vs.

UNFORGETTABLE COATINGS INC,;
UNFORGETTABLE COATINGS OF IDAHO
LLC; DOES 1 through 50; inclusive.

Defendants.

Case No.: 2:21-cv-01221-JCM-VCF

**STIPULATION TO EXTEND DEADLINE
FOR DEFENDANTS TO RESPOND TO
PLAINTIFF'S COMPLAINT**

(FOURTH REQUEST)

IT IS HEREBY STIPULATED by and between Plaintiff Jose Ismael Zuniga, ("Plaintiff"), through his counsel, Gabroy Law Offices, and Defendants, Unforgettable Coatings, Inc. and Unforgettable Coatings of Idaho, LLC, ("Defendants"), by and through their counsel, Jackson Lewis P.C., that Defendants shall have an extension up to and including October 7, 2021, in which to file their respective responses to Plaintiff's Complaint. This Stipulation is submitted and based upon the following:

1. Plaintiff filed his Complaint on May 25, 2021 in the Eighth Judicial District Court of Clark County, Nevada, Case No. A-21-835257-C. The Summons and Complaint were served on or about June 8, 2021.

2. Defendants' filed their Petition for Removal of Civil Action from State Court on June 29, 2021.

1 3. Defendants' Answer is currently due September 7, 2021.

2 4. This is the fourth request for an extension of time for Defendants to file a response
3 to Plaintiff's Complaint.

4 5. The parties are discussing a potential resolution of Plaintiff's claims, which would
5 render any such response unnecessary.

6 6. This request is made in good faith and not for the purpose of delay.

7 7. Nothing in this Stipulation, nor the fact of entering to the same, shall be construed
8 as waiving any claim and/or defense held by any party.

9 Dated this 2nd day of September, 2021.

10 GABROY LAW OFFICES

JACKSON LEWIS P.C.

11 /s/ Christian Gabroy

/s/ Holly E. Walker

12 Christian Gabroy, State Bar No. 8805
13 Kaine Messer, State Bar No. 14240
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15 170 S. Green Valley Pkwy., Suite 280
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15 Attorneys for Plaintiff

Attorneys for Defendants

17 **ORDER**

18 IT IS SO ORDERED.

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20 _____
U.S. Magistrate Judge

21 Dated: 9-9-2021
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