

1 Paul T. Trimmer  
2 Nevada State Bar No. 9291  
3 Holly E. Walker  
4 Nevada State Bar No. 14295  
5 **JACKSON LEWIS P.C.**  
6 300 S. Fourth Street, Suite 900  
7 Las Vegas, Nevada 89101  
8 Tel: (702) 921-2460  
9 Fax: (702) 921-2461  
10 Email: [paul.trimmer@jacksonlewis.com](mailto:paul.trimmer@jacksonlewis.com)  
11 Email: [holly.walker@jacksonlewis.com](mailto:holly.walker@jacksonlewis.com)

12 *Attorneys for Defendants*  
13 *Unforgettable Coatings, Inc.;*  
14 *Unforgettable Coatings of Idaho LLC*

15 **UNITED STATES DISTRICT COURT**

16 **DISTRICT OF NEVADA**

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

19 Plaintiff,

20 vs.

21 UNFORGETTABLE COATINGS INC.;  
22 UNFORGETTABLE COATINGS OF IDAHO  
23 LLC; DOES 1 through 50; inclusive.

24 Defendants.

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

26 **STIPULATION TO EXTEND DEADLINE  
FOR DEFENDANTS TO RESPOND TO  
PLAINTIFF'S COMPLAINT  
(FOURTH REQUEST)**

27 IT IS HEREBY STIPULATED by and between Plaintiff Jose Ismael Zuniga, ("Plaintiff"),  
28 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:

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

32 2. Defendants' filed their Petition for Removal of Civil Action from State Court on  
33 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

11          JACKSON LEWIS P.C.

12          \_\_\_\_\_  
13          /s/ Christian Gabroy  
14          Christian Gabroy, State Bar No. 8805  
15          Kaine Messer, State Bar No. 14240  
16          Dominique Bosa-Edwards, State Bar No. 15705  
17          170 S. Green Valley Pkwy., Suite 280  
18          Henderson, NV 89012

19          Attorneys for Plaintiff

20          \_\_\_\_\_  
21          /s/ Holly E. Walker  
22          Paul T. Trimmer, State Bar No. 9291  
23          Holly E. Walker, State Bar No. 14295  
24          300 S. Fourth Street, Suite 900  
25          Las Vegas, Nevada 89101

26          Attorneys for Defendants

17           **ORDER**

18           IT IS SO ORDERED.

19             
20          \_\_\_\_\_  
21          U.S. Magistrate Judge

22          Dated: 9-9-2021