

1 **H1 LAW GROUP**  
 Jill Garcia, NV Bar No. 7805  
 2 jill@h1lawgroup.com  
 Amy L. Howard, NV Bar No. 13946  
 3 ahoward@hone.law  
 701 N. Green Valley Parkway, Suite 200  
 4 Henderson, NV 89074  
 Phone 702-608-3720  
 5 Fax 702-703-1063

6 *Attorneys for Plaintiff*

7 UNITED STATES DISTRICT COURT  
 8 DISTRICT OF NEVADA

9 FEDERICO GARIBALDI, an individual,  
 10 Plaintiff,  
 11 vs.  
 12 BOYD GAMING CORPORATION, a Nevada  
 corporation; DOES I through X, inclusive; and  
 13 ROE BUSINESS ENTITIES, I through X,  
 inclusive,  
 14 Defendant.

Case No. 2:21-cv-01444-GMN-DJA

**JOINT REQUEST STIPULATION AND  
 [PROPOSED] ORDER TO CONTINUE  
 DATE OF EARLY NEUTRAL  
 EVALUATION SESSION  
 [First Request]**

H1 LAW GROUP  
 701 N. Green Valley Parkway, Suite 200  
 Henderson, Nevada 89074  
 Tel: 702-608-3720



16 Plaintiff Federico Garibaldi (“Plaintiff”) and Defendant Boyd Gaming Corporation  
 17 (“Defendant”) (“Parties”), by and through their respective undersigned counsel, submit the  
 18 following Joint Request and [Proposed] Order to Continue the January 12, 2022 Early Neutral  
 19 Evaluation (“ENE”) [ECF No. 9] request as follows:

- 20 1. On August 31, 2021, the Court scheduled the ENE for December 10, 2021 and  
 21 further set the deadline to submit Confidential ENE Statements for December 3, 2021. [ECF No.  
 22 9].
- 23 2. Due to a conflict in the Court’s calendar, on November 17, 2021, the Court filed  
 24 an Order Scheduling Early Neutral Evaluation Session (“Order”) for January 12, 2022 and  
 25 further set the deadline to submit Confidential ENE Statements for January 5, 2022. [ECF No.  
 26 17].
- 27 3. On January 5, 2021, the parties each submitted their Confidential ENE Statements  
 28 to the Court.

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1 4. Plaintiff just informed his counsel that he has accepted a job after a long and  
2 arduous three-year search for replacement employment. Unfortunately, Plaintiff's new job starts  
3 on Tuesday, January 11, 2022, and he has been unable to secure time off for the ENE currently  
4 scheduled for January 12, 2022.

5 5. Therefore, the Parties respectfully request the ENE Session be continued for thirty  
6 (30) days such that Plaintiff can establish his new employment and request time off to attend the  
7 ENE Session.

8 6. The Parties and their client representatives are available on February 28, 2022.

9 7. The Parties hereby request that the Court continue the January 12, 2022 ENE for  
10 February 28, 2022.

11 8. This Joint Request and Proposed Order is sought in good faith and not for the  
12 purposes of delay.

13 9. This is the first request to continue the ENE.

14 IT IS SO STIPULATED.

15 Dated this 6th day of January 2022.

Dated this 6th day of January 2022.

16 **H1 LAW GROUP**

**KAMER ZUCKER ABBOTT**

17 /s/Amy L. Howard  
18 Jill Garcia, NV Bar No. 7805  
jill@h1lawgroup.com  
19 Amy L. Howard, NV Bar No. 13946  
ahoward@hone.law  
20 701 N. Green Valley Parkway, Suite 200  
Henderson, NV 89074  
21 Phone 702-608-3720  
Fax 702-703-1063

/s/Jen J. Sarafina  
Jen J. Sarafina, NV Bar No. 9679  
jsarafina@kzalaw.com  
Kaitlin H. Paxton, NV Bar No. 13625  
kpaxton@kzalaw.com  
3000 W. Charleston Blvd., Ste. 3  
Las Vegas, NV 89102  
Phone 702-259-8640  
Fax 702-259-8646

22 *Attorneys for Plaintiff*

*Attorneys for Defendant*

23  
24 **ORDER**

25 IT IS ORDERED that ECF No. 18 is GRANTED. The Settlement Conference is  
26 rescheduled to 2/28/2022 at 9:00 a.m. IT IS FURTHER ORDERED that the pre-ENE  
27 Telephonic Conference set for 1/11/2022 is hereby VACATED and will not be  
28 rescheduled.

IT IS SO ORDERED

DATED: 1:09 pm, January 07, 2022

BRENDA WEKSLER  
UNITED STATES MAGISTRATE JUDGE