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12

13 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**  
14

ANGELA WILLIAMS; JANE DOE #1; JANE  
15 DOE #2,

16 Plaintiffs,

17 v.

18 STEVE SISOLAK, Governor of Nevada, in his  
official capacity; AARON FORD, Attorney  
19 General of Nevada, in his official capacity;  
THE CITY OF LAS VEGAS; CLARK  
20 COUNTY; NYE COUNTY; WESTERN  
BEST, INC. D/B/A CHICKEN RANCH;  
21 WESTERN BEST LLC; JAMA RASHID;  
MALLY MALL MUSIC, LLC; FUTURE  
22 MUSIC, LLC; PF SOCIAL MEDIA  
MANAGEMENT, LLC; E.P. SANCTUARY;  
23 BLU MAGIC MUSIC, LLC; EXCLUSIVE  
BEAUTY LOUNGE, LLC; FIRST  
24 INVESTMENT PROPERTY, LLC; V.I.P.  
ENTERTAINMENT, LLC; MP3  
25 PRODUCTIONS, INC.; MMM  
PRODUCTIONS, INC.;  
26  
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CASE NO.: 2:21-cv-01676

**STIPULATION AND [REDACTED],  
ORDER FOR EXTENSION OF TIME TO  
ANSWER DEFENDANT'S MOTION TO  
DISMISS [DOCKET #98] AND WESTERN  
DEFENDANT'S PRESERVATION OF  
RIGHT TO OPPOSE PLAINTIFFS'  
MOTIONS FOR PROTECTIVE ORDERS  
[DOCKET #2 AND DOCKET #50]**

**[FIRST REQUEST]**

SHAC, LLC D/B/A SAPPHIRE  
GENTLEMAN'S CLUB AND/OR  
SAPPHIRE; SHAC MT, LLC; and LAS  
VEGAS BISTRO, LLC D/B/A LARRY  
FLYNT'S HUSTLER CLUB,

Defendants.

COMES NOW Plaintiffs, Angela Williams, Jane Doe #1, and Jane Doe #2, by and through their counsel of record, HUTCHISON & STEFFEN, PLLC, and Defendants, Western Best, Inc d/b/a Chicken Ranch and Western Best, LLC ("Defendants"), by and through their counsel of record, the law firm of FOX ROTHSCHILD LLP, hereby stipulate and agree to the following regarding Defendants' Motion to Dismiss filed on December 23, 2021 [Docket #98]:

1. This is the first stipulation for extension of time to file a response to Defendants' Motion to Dismiss [Docket #98];
2. Plaintiffs Angela Williams, Jane Doe #1, and Jane Doe #2 have a two-week extension to file and opposition to Defendants' Motion to Dismiss [Docket # 98], extending their deadline to respond to January 20, 2022; and
3. The reason for the extension is Pursuant to Local Rules, Plaintiffs Angela Williams, Jane Doe #1, and Jane Doe #2 have "fourteen days after service of the response" to file their reply. See LR 7-2(b). Fourteen days after the service of the response is Thursday, January 6, 2022. Counsel for Plaintiffs Angela Williams, Jane Doe #1, and Jane Doe #2 took an extended holiday from December 24, 2021, until January 4, 2022, to visit friends and family out of state in conjunction with the Christmas and New Year's holidays. Additionally, now legal counsel for Plaintiffs has not contracted COVID. Accordingly, it is agreed that the above extension is agreed upon with good cause.
4. Defendants preserve the right to respond to Plaintiffs' Motions for Protective Orders [Docket #2 and Docket #50], but will not be required to do so until the Court rules on all the currently pending dispositive motions. Plaintiffs will not seek a ruling on their respective Motions for Protective Orders until Defendants are permitted a reasonable

1 period of time to oppose the same.

2 **IT IS SO STIPULATED.**

3 DATED this 5<sup>th</sup> day of January, 2022.

DATED this 5<sup>h</sup> day of January, 2022.

4 **FOX ROTHSCHILD LLP**

**HUTCHINSON & STEFFEN, PLLC**

5 */s/ Deanna L. Forbush*

*/s/ Jason D. Guinasso*

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7 Deanna L. Forbush  
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*Attorney for Plaintiffs*

14 *Attorneys for Defendants Western Best, LLC*  
15 *and Western Best Inc. d/b/a Chicken Ranch*

**ORDER**

IT IS HEREBY ORDERED that Plaintiffs, Angela Williams; Jane Doe #1; and Jane Doe #2 have an extension of time for Plaintiffs to file their Response to Defendants' Motion to Dismiss [Docket # 98] to **January 20, 2022.**

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**IT IS SO ORDERED** this 10th day of January, 2022.



\_\_\_\_\_  
DISTRICT COURT JUDGE

Respectfully Submitted by:  
**HUTCHISON & STEFFEN, PLLC**

By: /s/ Jason D. Guinasso  
Jason D. Guinasso  
Nevada Bar No. 8478  
HUTCHISON & STEFFEN, PLLC  
5371 Kietzke Lane  
Reno, NV 89511  
*Attorney Plaintiffs*

**ELECTRONIC CERTIFICATE OF SERVICE**

Pursuant to FRCP 5(b), I hereby certify that on this 5th day of January, 2022, I electronically filed a true and correct copy of the **STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO ANSWER DEFENDANT’S MOTION TO DISMISS [DOCKET #98] AND WESTERN DEFENDANT’S PRESERVATION OF RIGHT TO OPPOSE PLAINTIFFS’ MOTIONS FOR PROTECTIVE ORDERS** which was electronically filed with the United States District Court. Electronic service of the foregoing document shall be made in accordance with the Master Service List as follows:

**Defendant**

**Steve Sisolak**  
*Governor of Nevada*

represented by **Gregory Louis Zunino**  
Nevada State Attorney General’s Office 100  
N Carson Street Carson City, NV 89701  
775-684-1137  
Fax: 775-684-1108  
Email: GZunino@ag.nv.gov,  
sgeyer@ag.nv.gov

**Defendant**

**Aaron Ford**  
*Attorney General of Nevada*

represented by **Gregory Louis Zunino**  
(See above for address)

**Defendant**

**The City of Las Vegas**

represented by **Jeffrey L Galliher**  
Las Vegas City Attorney’s Office  
495 S Main Street, 6th Flr  
Las Vegas, NV 89101  
702-229-6629  
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ckelly@lasvegasnevada.gov,  
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**Defendant**  
**Clark County**

represented by **Joel K Browning**  
Clark County District Attorney Civil Division  
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**Defendant**  
**Nye County**

represented by **Brent L Ryman Erickson**  
Thorpe & Swainston, Ltd.  
99 W. Arroyo  
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[daguirre@etsreno.com](mailto:daguirre@etsreno.com), [lligouri@etsreno.com](mailto:lligouri@etsreno.com)

**Defendant**  
Las Vegas Bistro, LLC D/B/A  
Larry Flynt's Hustler Club

represented by **Zachary Youngsma**  
c/o Deanna L. Forbush  
Fox Rothschild LLP  
198 Festival Plaza Drive, Suite 700  
Las Vegas, Nevada 89135  
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Fax: 702-597-5503  
Email: [dforbush@foxrothschild.com](mailto:dforbush@foxrothschild.com);  
[zach@bradshaferlaw.com](mailto:zach@bradshaferlaw.com)

**Defendant**  
Western Best Inc. D/B/A  
Chicken Ranch

represented by **Deanna L. Forbush**  
Fox Rothschild LLP  
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Las Vegas, Nevada 89135  
702-262-6899  
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1 **Defendant**

2 Western Best LLC

3 represented by **Deanna L. Forbush**

4 Fox Rothschild LLP

5 198 Festival Plaza Drive, Suite 700

6 Las Vegas, Nevada 89135

7 702-262-6899

8 Fax: 702-597-5503

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10 **Defendant**

11 SHAC, LLC d/b/a Sapphire

12 Gentlemen's Club and/or Sapphire

13 Represented by:

14 Lewis Roca Rothgerber Christie LLP

15 Hughes Center

16 3993 Howard Hughes Parkway

17 Suite 600

18 Las Vegas, NV 89169-5996

19 702.474.2622

20 702.949.8298 (fax)

21 E-mail: [OBrown@lrrc.com](mailto:OBrown@lrrc.com)

22 **Defendant**

23 SHAC, MT, LLC

24 Represented by:

25 Lewis Roca Rothgerber Christie LLP

26 Hughes Center

27 3993 Howard Hughes Parkway

28 Suite 600

Las Vegas, NV 89169-5996

702.474.2622

702.949.8298 (fax)

E-mail: [OBrown@lrrc.com](mailto:OBrown@lrrc.com)

**CERTIFICATE OF SERVICE**

Pursuant to FRCP 5(b), I hereby certify that on this 5th day of January, 2022, **STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO ANSWER DEFENDANT'S MOTION TO DISMISS [DOCKET #98] AND WESTERN DEFENDANT'S PRESERVATION OF RIGHT TO OPPOSE PLAINTIFFS' MOTIONS FOR PROTECTIVE ORDERS** was electronically filed with the United States District Court. I caused service via US Mail upon the following:

**Defendant**

Jamal Rashid  
Federal Correction Institution  
Sheridan at 27072 SW Ballston Rd.  
Sheridan, OR 97378  
(Inmate #45040-509)

**Defendant**

Mally Mall Music, LLC  
Attn: Jamal Rashid  
Federal Correction Institution Sheridan  
27072 SW Ballston Rd.  
Sheridan, OR 97378  
(Inmate #45040-509)

**Defendant**

E.P. Sanctuary  
Attn: Jamal Rashid  
Federal Correction Institution Sheridan  
27072 SW Ballston Rd.  
Sheridan, OR 97378  
(Inmate #45040-509)

**Defendant**

Blu Magic Music, LLC  
Attn: Jamal Rashid  
Federal Correction Institution Sheridan  
27072 SW Ballston Rd.  
Sheridan, OR 97378  
(Inmate #45040-509)



**Defendant**

Exclusive Beauty Lounge, LLC  
Attn: Jamal Rashid  
Federal Correction Institution Sheridan  
27072 SW Ballston Rd.  
Sheridan, OR 97378  
(Inmate #45040-509)

**Defendant**

First Investment Property LLC  
Attn: Jamal Rashid  
Federal Correction Institution Sheridan  
27072 SW Ballston Rd.  
Sheridan, OR 97378  
(Inmate #45040-509)

**Defendant**

V.I.P Entertainment, LLC  
Attn: Jazz A.  
2764 N Green Valley Pkwy #400  
Henderson, NV, 89014

**Defendant**

MP3 Productions, INC.,  
c/o Registered Agent: Nevada Corporate Headquarters, Inc.  
4730 S Fort Apache Rd, Suite 300,  
Las Vegas, NV, 89147

**Defendant**

MMM Productions, INC,  
Attn: Jamal Rashid  
Federal Correction Institution  
Sheridan at 27072 SW Ballston Rd.  
Sheridan, OR 97378  
(Inmate #45040-509)

DATED this 5<sup>th</sup> day of January, 2022

BY: /s/Melissa Lilley

An Employee of Hutchison & Steffen, PLLC