

1 Jason D. Guinasso, Esq  
2 Nevada Bar No. 8478  
3 [jguinasso@hutchlegal.com](mailto:jguinasso@hutchlegal.com)  
4 HUTCHISON & STEFFEN, PLLC  
5 5371 Kietzke Lane  
6 Reno, NV 89511  
7 Telephone: (775) 853-8746  
8 Fax: (775) 201-9611

9  
10 Benjamin W. Bull\*  
11 Peter A. Gentala\*  
12 Dani Bianculli Pinter\*  
13 Pansy Watson\*  
14 NATIONAL CENTER ON SEXUAL  
15 EXPLOITATION  
16 1201 F Street NW, Suite 200  
17 Washington, DC 20004  
18 (202) 393-7245  
19 lawcenter@ncose.com

20 \*Admitted Pro Hac Vice  
21 Attorneys for Plaintiffs

22  
23  
24  
25  
26  
27  
28 **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  
19 official capacity; AARON FORD, Attorney  
20 General of Nevada, in his official capacity;  
21 THE CITY OF LAS VEGAS; CLARK  
22 COUNTY; NYE COUNTY; WESTERN  
23 BEST, INC. D/B/A CHICKEN RANCH;  
24 WESTERN BEST LLC; JAMA RASHID;  
25 MALLY MALL MUSIC, LLC; FUTURE  
MUSIC, LLC; PF SOCIAL MEDIA  
MANAGEMENT, LLC; E.P. SANCTUARY;  
BLU MAGIC MUSIC, LLC; EXCLUSIVE  
BEAUTY LOUNGE, LLC; FIRST  
INVESTMENT PROPERTY, LLC; V.I.P.  
ENTERTAINMENT, LLC; MP3  
PRODUCTIONS, INC.; MMM  
PRODUCTIONS, INC.;

CASE NO.: 2:21-cv-01676

**STIPULATION AND 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]**

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

4 Defendants.

5  
6 COMES NOW Plaintiffs, Angela Williams, Jane Doe #1, and Jane Doe #2, by and through  
7 their counsel of record, HUTCHISON & STEFFEN, PLLC, and Defendants, Western Best, Inc  
8 d/b/a Chicken Ranch and Western Best, LLC ("Defendants"), by and through their counsel of  
9 record, the law firm of FOX ROTHSCHILD LLP, hereby stipulate and agree to the following  
10 regarding Defendants' Motion to Dismiss filed on December 23, 2021 [Docket #98]:

11  
12 1. This is the first stipulation for extension of time to file a response to Defendants'  
13 Motion to Dismiss [Docket #98];  
14 2. Plaintiffs Angela Williams, Jane Doe #1, and Jane Doe #2 have a two-week extension  
15 to file and opposition to Defendants' Motion to Dismiss [Docket # 98], extending their  
16 deadline to respond to January 20, 2022; and  
17 3. The reason for the extension is Pursuant to Local Rules, Plaintiffs Angela Williams,  
18 Jane Doe #1, and Jane Doe #2 have "fourteen days after service of the response" to file  
19 their reply. See LR 7-2(b). Fourteen days after the service of the response is Thursday,  
20 January 6, 2022. Counsel for Plaintiffs Angela Williams, Jane Doe #1, and Jane Doe  
21 #2 took an extended holiday from December 24, 2021, until January 4, 2022, to visit  
22 friends and family out of state in conjunction with the Christmas and New Year's  
23 holidays. Additionally, now legal counsel for Plaintiffs has not contracted COVID.  
24 Accordingly, it is agreed that the above extension is agreed upon with good cause.  
25 4. Defendants preserve the right to respond to Plaintiffs' Motions for Protective Orders  
26 [Docket #2 and Docket #50], but will not be required to do so until the Court rules on  
27 all the currently pending dispositive motions. Plaintiffs will not seek a ruling on their  
28 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.

4 **FOX ROTHSCHILD LLP**

5 */s/ Deanna L. Forbush*

6  
7 Deanna L. Forbush  
8 Nevada Bar No. 6646  
9 Rex D. Garner  
Nevada Bar No. 9401  
10 John M. Orr  
Nevada Bar No. 14251  
11 1980 Festival Plaza Drive, Suite 700  
Las Vegas, NV 89135  
Telephone: (702) 699-5169  
Facsimile: (702) 597-5503  
12 [Dforbush@foxrothschild.com](mailto:Dforbush@foxrothschild.com)  
[Rgarner@foxrothschild.com](mailto:Rgarner@foxrothschild.com)  
[Jorr@foxrothschild.com](mailto:Jorr@foxrothschild.com)

13  
14 *Attorneys for Defendants Western Best, LLC*  
*and Western Best Inc. d/b/a Chicken Ranch*

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

16 **HUTCHINSON & STEFFEN, PLLC**

17 */s/ Jason D. Guinasso*

18 Jason D. Guinasso, Esq.  
Nevada Bar No. 8478  
5371 Kietzke Lane  
Reno, Nevada 89511  
Tel: (775) 853.8746  
Fax: (775) 201.9611  
[jguinasso@hutchlegal.com](mailto:jguinasso@hutchlegal.com)  
*Attorney for Plaintiffs*

## **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.

|||||

|||||

1111

1 2 3 4

777

10 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](mailto:GZunino@ag.nv.gov),  
[sgeyer@ag.nv.gov](mailto: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**

(See above for address)

represented by **Jeffrey L Galliher**

Las Vegas City Attorney

1      **Defendant**

2      **Clark County**

represented by **Joel K Browning**

Clark County District Attorney Civil Division  
500 S. Grand Central Pkwy, #5075  
Las Vegas, NV 89155-2215  
702-455-4761  
Fax: 702-382-5178  
Email: [joel.browning@clarkcountyda.com](mailto:joel.browning@clarkcountyda.com),  
christine.wirt@clarkcountyda.com,  
Tawana.Thomas@clarkcountyda.com

7      **Defendant**

8      **Nye County**

represented by **Brent L Ryman Erickson**

Thorpe & Swainston, Ltd.  
99 W. Arroyo  
P.O. Box 3559  
Reno, NV 89505  
775-786-3930  
Fax: 775-786-4160  
Email: [bryman@etsreno.com](mailto:bryman@etsreno.com),  
[daguirre@etsreno.com](mailto:daguirre@etsreno.com), [liligouri@etsreno.com](mailto:liligouri@etsreno.com)

13     **Defendant**

14     Las Vegas Bistro, LLC D/B/A

15     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  
702-262-6899  
Fax: 702-597-5503  
Email: [dforbush@foxrothschild.com](mailto:dforbush@foxrothschild.com);  
[zach@bradshaferlaw.com](mailto:zach@bradshaferlaw.com)

21     **Defendant**

22     Western Best Inc. D/B/A

23     Chicken Ranch

represented by **Deanna L. Forbush**

Fox Rothschild LLP  
198 Festival Plaza Drive, Suite 700  
Las Vegas, Nevada 89135  
702-262-6899  
Fax: 702-597-5503  
Email: [dforbush@foxrothschild.com](mailto:dforbush@foxrothschild.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 Instutuion  
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**

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

**Defendant**

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

1      **Defendant**

2      Exclusive Beauty Lounge, LLC  
3      Attn: Jamal Rashid  
4      Federal Correction Institution Sheridan  
5      27072 SW Ballston Rd.  
6      Sheridan, OR 97378  
7      (Inmate #45040-509)

8      **Defendant**

9      First Investment Property LLC  
10     Attn: Jamal Rashid  
11     Federal Correction Institution Sheridan  
12     27072 SW Ballston Rd.  
13     Sheridan, OR 97378  
14     (Inmate #45040-509)

15     **Defendant**

16     V.I.P Entertainment, LLC  
17     Attn: Jazz A.  
18     2764 N Green Valley Pkwy #400  
19     Henderson, NV, 89014

20     **Defendant**

21     MP3 Productions, INC.,  
22     c/o Registered Agent: Nevada Corporate Headquarters, Inc.  
23     4730 S Fort Apache Rd, Suite 300,  
24     Las Vegas, NV, 89147

25     **Defendant**

26     MMM Productions, INC,  
27     Attn: Jamal Rashid  
28     Federal Correction Instutuion  
29     Sheridan at 27072 SW Ballston Rd.  
30     Sheridan, OR 97378  
31     (Inmate #45040-509)

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

33     BY: /s/Melissa Liley

34     An Employee of Hutchison & Steffen, PLLC