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5 Attorneys for Defendant
TK ELEVATOR CORPORATION f/k/a
6 THYSSENKRUPP ELEVATOR CORPORATION

7 UNITED STATES DISTRICT COURT

8 DISTRICT OF NEVADA

9 NATHAN WHITE,

10 Plaintiff,

11 vs.

12 TK ELEVATOR CORPORATION f/k/a
13 THYSSENKRUPP ELEVATOR
CORPORATION; DOES I through X, inclusive;
14 and ROE BUSINESS ENTITIES I through X,
inclusive,

15 Defendants.
16

CASE NO. 2:21-cv-01696-ART-VCF

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE
OPPOSITION AND REPLY**

17 IT IS HEREBY STIPULATED between Plaintiff, Nathan White, and Defendant, TK Elevator
18 Corporation f/k/a Thyssenkrupp Elevator Corporation, by and through their respective counsel of
19 record, that the time to file an Opposition to Plaintiff's Motion to Compel [36] filed on November
20 3, 2023 be extended, through and including November 22, 2023, and Plaintiff will have to and
21 including December 4, 2023 to reply to Defendant's opposition.

22 Dated this ___ day of November, 2023.

Dated this ___ day of November, 2023.

23 SHOOK & STONE, CHTD.

ROGERS, MASTRANGELO, CARVALHO &
24 MITCHELL

25 /s/ John B. Shook

/s/ Rebecca L. Mastrangelo

26 John B. Shook Esq.
Nevada Bar No. 5499
27 Lynn R. Shoen, Esq.
Nevada Bar No. 1197
28 710 S. Fourth Street
Las Vegas, Nevada 89101
Attorneys for Plaintiff

Rebecca L. Mastrangelo, Esq.
Nevada Bar No. 5417
700 South Third Street
Las Vegas, Nevada 89101
Attorneys for Defendant

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ORDER

IT IS SO ORDERED this 13th day of November, 2023.



U.S. MAGISTRATE JUDGE

SUBMITTED BY:

ROGERS, MASTRANGELO, CARVALHO
& MITCHELL

/s/ Rebecca L. Mastrangelo

REBECCA L. MASTRANGELO, ESQ.
Nevada Bar No. 5417
700 S. Third Street
Las Vegas, Nevada 89101
Attorney for Defendant

Carolyn Mangundayao

Subject: RE: TK adv. White

From: Lynn Shoen <lshoen@shookandstone.com>

Sent: Thursday, November 9, 2023 3:43 PM

To: Rebecca Mecham <rmecham@rmcmlaw.com>; Rebecca Mastrangelo <rmastrangelo@rmcmlaw.com>; Kiana A. O'Day <KO'Day@shookandstone.com>; John Shook <johnshook@shookandstone.com>

Cc: Kathy Vigil <kvigil@rmcmlaw.com>

Subject: RE: TK adv. White

You can affix John's signature.

Thanks, Lynn



Lynn Shoen | Attorney

P: 702.570.0000 | C: 702-380-8981 | F: 702.485.5266 | Direct: 702-380-8981

Offices: Downtown Las Vegas, NV: 710 S. 4th Street, Las Vegas, NV 89101
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From: Rebecca Mecham <rmecham@rmcmlaw.com>

Sent: Thursday, November 9, 2023 1:05 PM

To: Rebecca Mastrangelo <rmastrangelo@rmcmlaw.com>; Lynn Shoen <lshoen@shookandstone.com>; Kiana A. O'Day <KO'Day@shookandstone.com>; John Shook <johnshook@shookandstone.com>

Cc: Kathy Vigil <kvigil@rmcmlaw.com>; Rebecca Mecham <rmecham@rmcmlaw.com>

Subject: RE: TK adv. White

Rebecca Mecham
Paralegal

From: Rebecca Mastrangelo <rmastrangelo@rmcmlaw.com>

Sent: Thursday, November 9, 2023 12:56 PM

To: Lynn Shoen <lshoen@shookandstone.com>; Rebecca Mecham <rmecham@rmcmlaw.com>; Kiana A. O'Day <KO'Day@shookandstone.com>; John Shook <johnshook@shookandstone.com>

Cc: Kathy Vigil <kvigil@rmcmlaw.com>

Subject: RE: TK adv. White

Sure thing.

Becki – please revise and send it back to Lynn for approval.

Thanks, everyone.

From: Lynn Shoen <lshoen@shookandstone.com>

Sent: Thursday, November 9, 2023 12:52 PM

To: Rebecca Mecham <rmecham@rmcmlaw.com>; Kiana A. O'Day <KO'Day@shookandstone.com>; John Shook <johnshook@shookandstone.com>

Cc: Rebecca Mastrangelo <rmastrangelo@rmcmlaw.com>; Kathy Vigil <kvigil@rmcmlaw.com>

Subject: RE: TK adv. White

Hello Rebecca

Please put in 10 days to file Reply.

Thanks, Lynn



Lynn Shoen | Attorney

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From: Rebecca Mecham <rmecham@rmcmlaw.com>

Sent: Thursday, November 9, 2023 12:24 PM

To: Lynn Shoen <lshoen@shookandstone.com>; Kiana A. O'Day <KO'Day@shookandstone.com>

Cc: Rebecca Mecham <rmecham@rmcmlaw.com>; Rebecca Mastrangelo <rmastrangelo@rmcmlaw.com>; Kathy Vigil <kvigil@rmcmlaw.com>

Subject: TK adv. White

Counsel,

Attached is a draft Stipulation and Order to Extend Time to File Opposition and Reply. Please let me know what reply deadline to insert in the Stipulation.

If the stipulation meets with your approval, please provide your authorization to utilize your e-signature for submission to the Court.

Thank you,



Rebecca Mecham, Paralegal to
Stephen H. Rogers, Esq.
Rebecca L. Mastrangelo, Esq.
William C. Mitchell, Esq.
and Kerry O. Pluck, Esq.
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