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*Attorney for Plaintiff*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

RONALD CARPENTER, JR., an individual;  
  
Plaintiff,  
  
vs.  
  
GORDON DENNY, an individual; PV  
HOLDING CORP. dba AVIS CAR RENTAL,  
a foreign corporation; CANONICAL GROUP  
LIMITED, a foreign corporation; DOES I  
through V, inclusive and ROE  
CORPORATIONS II through V, inclusive;  
Defendants.  

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ALLSTATE INSURANCE COMPANY,  
  
Intervenor.

CASE NO.: 2:23-CV-00208-RFB-NJK  
  
**STIPULATION AND ORDER TO  
EXTEND JOINT PRETRIAL ORDER  
DEADLINE (THIRD REQUEST)**



Pursuant to Local Rules IA 6-1, 6-2 and LR 7-1, the undersigned counsel of record for Plaintiff, Defendants Gordon Denny and PV Holding Corp and Intervenor Allstate Insurance Company hereby STIPULATE to extend the time for the parties to file their Joint Pretrial Order as set forth in the Court’s Minute Oder dated October 30, 2024 (ECF No. 58) by 30 days. The current deadline for said disclosure is January 2, 2025. This is the third stipulation seeking to extend the subject deadline. This extension would give the parties until February 3, 2025.

The parties submit that good cause exists for the requested extension. The parties are continuing their efforts in drafting exhibit lists and culling down the extensive exhibits in this matter for trial. Moreover, the parties recently attended private mediation on October 17, 2024. Defendant

1 has requested additional time to fully evaluate and consider various issues that were raised during the  
2 mediation, in hopes of potentially reaching a settlement agreement. Lastly, the parties fully intended  
3 to finalize their efforts to meet and confer on the various trial issues by the current deadline,  
4 however, Counsel for Defendant Denny recently experienced an unfortunate death in his immediate  
5 family right before the Christmas holiday, placing him out of the office entirely.

6 The parties further submit that this extension is requested in good faith and with no dilatory  
7 motive.

8 IT IS HEREBY STIPULATED by all parties, by and through their undersigned counsel, that  
9 the deadline for the parties to submit their Joint Pretrial Order be extended to February 3, 2025.

10 Respectfully submitted,

11 DATED this 2<sup>nd</sup> day of January, 2025.

DATED this 2<sup>nd</sup> day of January, 2025.

12 **LADAH LAW FIRM**

**PYATT SILVESTRI**

13 /s/ Ramzy P. Ladah

/s/ Robert P. Molina

14 \_\_\_\_\_  
15 RAMZY P. LADAH, ESQ.

\_\_\_\_\_

16 Nevada Bar No. 11405

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18 Las Vegas, NV 89101

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19 *Attorneys for Plaintiff*

Las Vegas, NV 89128

*Attorneys for Defendants*  
*Gordon Denny and PV Holding Corp.*

20 DATED this 2<sup>nd</sup> day of January, 2025.

21 **RESNICK & LOUIS, P.C.**

22 /s/ Gary R. Guelker

23 \_\_\_\_\_  
24 GARY R. GUELKER, ESQ.

25 Nevada Bar No. 10603

26 8925 W. Russell Rd., Suite 220

27 Las Vegas, NV 89148

28 *Attorneys for Intervenor*

*Allstate Insurance Company*

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**IT IS SO ORDERED.**

**Dated:** January 3, 2025



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**RICHARD F. BOULWARE, II**  
**UNITED STATES DISTRICT JUDGE**

**LADAH LAW**  
— F I R M —

