

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**RAMZY P. LADAH, ESQ.**  
Nevada Bar No. 11405  
**LADAH LAW FIRM**  
517 S. Third Street  
Las Vegas, NV 89101  
litigation@ladahlaw.com  
T: 702.252.0055  
F: 702.248.0055  
*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.

ALLSTATE INSURANCE COMPANY,  
  
Intervenor.

CASE NO.: 2:23-CV-00208-RFB-NJK

**STIPULATION AND ORDER TO  
EXTEND JOINT PRETRIAL ORDER  
DEADLINE (FOURTH 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 February 3, 2025. This is the fourth stipulation seeking to extend the subject deadline. This extension would give the parties until March 5, 2025.

The parties submit that good cause exists for the requested extension. The parties are continuing their efforts in finalizing exhibit lists and culling down the extensive exhibits in this matter for trial. Moreover, the parties had a meet and confer scheduled for January 31, 2025 to

1 finalize exhibits. Unfortunately, Mr. Ladah's mother unexpectedly passed away on January 20,  
2 2025. The funeral has been planned for January 31, 2025 so he will be unable to attend the meet and  
3 confer as scheduled and consequently unable meet the existing deadline.

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

6 IT IS HEREBY STIPULATED by all parties, by and through their undersigned counsel, that  
7 the deadline for the parties to submit their Joint Pretrial Order be extended to March 5, 2025.

8 Respectfully submitted,

9 DATED this 29<sup>th</sup> day of January, 2025.

DATED this 29<sup>th</sup> day of January, 2025.

10 **LADAH LAW FIRM**

**PYATT SILVESTRI**

11 */s/ Ramzy P. Ladah*

*/s/ Robert P. Molina*

12 \_\_\_\_\_  
13 RAMZY P. LADAH, ESQ.

\_\_\_\_\_

14 Nevada Bar No. 11405

ROBERT P. MOLINA, ESQ.

15 517 S. Third Street

Nevada Bar No. 6422

16 Las Vegas, NV 89101

7670 West Lake Mead Boulevard, Suite 250

17 *Attorneys for Plaintiff*

Las Vegas, NV 89128

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

18 DATED this 29<sup>th</sup> day of January, 2025.

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

20 */s/ Gary R. Guelker*

21 \_\_\_\_\_  
GARY R. GUELKER, ESQ.

22 Nevada Bar No. 10603

23 8925 W. Russell Rd., Suite 220

24 Las Vegas, NV 89148

25 *Attorneys for Intervenor*

26 *Allstate Insurance Company*

27 *///*

28 *///*



**IT IS SO ORDERED.**



---

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

**DATED:** This 29th day of January, 2025.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

