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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

10 DOUGLAS VASQUEZ, individually and
11 on behalf of all others similarly situated,

Case No. 2:23-cv-00441-CDS-DJA

12 Plaintiff

13 vs.
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STIPULATION AND ORDER TO
EXTEND TIME TO FILE
SETTLEMENT PAPERWORK

(First Request)

14 GIBRALTAR HOSPITALITY
15 SERVICES, LLC d/b/a and a/k/a 7TH
16 AND CARSON;
17 EMPLOYEE(S)/AGENT(S) DOES 1-10;
18 and ROE CORPORATIONS 11-20;
19 inclusive,
20 Defendant

21 Plaintiff Douglas Vasquez ("Plaintiff" or "Vasquez") and Defendant Gibraltar
22 Hospitality Services, LLC d/b/a and a/k/a 7th and Carson ("Defendant") (together
23 the "Parties"), by and through their respective counsel of record, hereby stipulate
24 and respectfully request a fourteen (14) day extension up to and
25 including **November 27, 2023** to file their proposed settlement and motion for
preliminary approval of class action settlement. This is the Parties' first request
for such an extension.

26 In support of this request, the Parties provide the following information
27 for the Court's consideration:

1 1. On October 11, 2023, the Parties filed their Notice of Settlement
2 advising the Court that the parties were preparing and exchanging appropriate
3 settlement paperwork and anticipated thereafter seeking approval of such class
4 action settlement pursuant to Rule 23(e) of the Federal Rules of Civil Procedure
5 and our law. See ECF No. 16.

6 2. On October 30, 2023, this Court ordered Plaintiff to submit a
7 proposed settlement along with a motion for preliminary approval of class action
8 settlement on or before November 13, 2023. See ECF No. 17.

9 3. The parties have been diligently working together in good faith
10 regarding such requisite settlement paperwork.

11 4. Specifically, the parties have exchanged their draft Joint Stipulation
12 of Settlement and Release with corresponding proposed exhibits thereto.
13 Defendant is currently reviewing the extensive documentation and the parties
14 anticipate circulating the documents for final approval and signature following such
15 review.

16 5. Further, the parties have also diligently drafted, exchanged, and
17 executed settlement paperwork in their separate NLRB matter.

18 To complete such necessary review and achieve finalization of the
19 settlement paperwork, including the anticipated motion for preliminary approval of
20 class action settlement, the Parties respectfully request a fourteen (14) day
21 extension, up to and including **November 27, 2023**, to file the proposed settlement
22 along with a motion for preliminary approval of class action settlement.

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1 This stipulation is made in good faith, not for purposes of delay or burden,
2 and pursuant to our Rules. Not parties are prejudiced by this Stipulation.

3 Respectfully submitted this 13th day of November 2023.

4 GABROY | MESSER

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28 7th and Carson*

1 **IT IS SO ORDERED:**

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3 **UNITED STATES DISTRICT JUDGE**

4 Dated: November 13, 2023