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9 **UNITED STATES DISTRICT COURT**
 10 **DISTRICT OF NEVADA**

12 SEBASTIAN SYMEONIDES, an Individual;
 13 **Plaintiff,**

14 vs.

15 TRUMP RUFFIN COMMERCIAL, LLC, a
 Foreign Limited-Liability Company d/b/a
 16 TRUMP INTERNATIONAL LAS VEGAS and
 TRUMP INTERNATIONAL HOTEL &
 17 TOWER LAS VEGAS; TRUMP RUFFIN
 TOWER I, LLC, a Foreign Limited-Liability
 18 Company; TRUMP INTERNATIONAL
 HOTELS MANAGEMENT, LLC, a Foreign
 19 Limited-Liability Company; OTIS ELEVATOR
 CORPORATION, a Foreign Corporation; DOES
 20 I through X, inclusive; and ROE BUSINESS
 ENTITIES I through XX inclusive,

21 **Defendants.**

CASE NO. 2:23-cv-00854-JAD-VCF

**STIPULATION AND ORDER TO
 EXTEND OPPOSITION DEADLINES
 TO DEFENDANT OTIS ELEVATOR
 COMPANY'S MOTIONS**

ECF No. 59

23 **IT IS HEREBY STIPULATED AND AGREED**, by all parties, by and through their
 24 respective counsel of record, that the deadlines for Plaintiff to file oppositions to Defendant Otis
 25 Elevator Company's Motion to Exclude John Koshak's Expert Opinion (ECF No. 53), currently
 26 due January 27, 2025, and Otis Elevator Company's Motion for Summary Judgment, currently
 27 due February 3, 2025 (ECF No. 54), shall both be extended to February 17, 2025.

28 Defendant Otis Elevator Company filed a Motion to Exclude John Koshak's Expert



1 Opinion [Dkt. #53] and a Motion for Summary Judgment [Dkt. #54] on January 13, 2025.
2 Defendant Trump Ruffin Tower I, LLC filed Joinders to both motions [Dkt. #56 and #58].

3 The parties agreed to consolidate and extend the deadlines for Plaintiff to oppose the
4 motion for summary judgment and the motion to exclude John Koshak. Good cause exists for this
5 request because both the motion for summary judgment and the motion to exclude involve
6 complex legal and factual issues that are interrelated. Properly addressing these motions requires
7 a thorough review of extensive records, expert reports, deposition testimony, and case law to
8 ensure the Court receives well-reasoned and comprehensive arguments. The issues raised in the
9 motion for summary judgment and the motion to exclude are closely intertwined. Extending the
10 deadlines will allow Plaintiff to present consistent and cohesive arguments, avoiding redundancy
11 and ensuring that the Court has the full context to make an informed decision. Aligning the
12 briefing deadlines for these motions will promote efficiency for all parties and the Court by
13 consolidating overlapping efforts and ensuring all relevant arguments are presented in a unified
14 manner.

15 This requested extension is made in good faith, and not for the purposes of delay.

16 Dated this 23rd day of January, 2025

18 Respectfully Submitted By:
19 CHRISTIANSEN TRIAL LAWYERS

20
21 /s/ Keely Chippoletti
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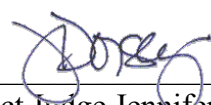
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I, LLC, erroneously sued herein as Trump
Ruffin Commercial, LLC, d/b/a Trump
International Vegas and Trump International
Hotel & Tower Las Vegas; and Trump
International Hotels Management, LLC*

ORDER

Based on the parties' stipulation [ECF No. 59] and good cause appearing, IT IS ORDERED that the deadlines to oppose the motion to exclude John Koshak's Expert Opinion [ECF No. 53] and the motion for summary judgment [ECF No. 54] are extended to February 17, 2025.



U.S. District Judge Jennifer A. Dorsey
Dated: January 28, 2025