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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JOHN MEGGS,
Plaintiff,

vs.

CIRCA HOSPITALITY GROUP II LLC,
D/B/A THE D LAS VEGAS
Defendant

Case No.: 2:23-cv-01117-RFB-MDC

PARTIES' JOINT STIPULATION TO
EXTEND TIME TO FILE STIPULATION OF
DISMISSAL (First Request)

Plaintiff, JOHN MEGGS (hereinafter "Plaintiff"), by and through his counsel of record, ROBERT P. SPRETNAK, ESQ. of the LAW OFFICES OF ROBERT P. SPRETNAK, and ANTHONY J. PEREZ, ESQ. of the LAW FIRM OF ANTHONY J. PEREZ LAW GROUP, PLLC, and Defendant CIRCA HOSPITALITY GROUP II LLC, D/B/A THE D LAS VEGAS by and through their counsel of record, CYNTHIA L. ALEXANDER, ESQ. and ALEXIS M. TAITEL, ESQ. of DICKINSON WRIGHT PLLC, stipulate as follows:

1 On July 8th, 2024, the Parties filed a Stipulation to Stay this case [D.E. 36] following a
2 Notice of Scheduling Mediation also filed by the Parties on July, 3rd, 2024 [D.E. 35], as the
3 Parties were confident they could resolve their dispute through mediation without the need of
4 court intervention. The Parties mediated this case with Mediator Peggy Leen on September 10th,
5 2024, and were able to come to an agreement. On September 11th, 2024, the Parties filed a Notice
6 of Settlement reflecting the resolution of the case per the Mediation that took place on September
7 10th, 2024 [D.E. 38]. The Parties asked the Court for seventy-five (75) days from the date of the
8 Notice of Settlement that was filed on September 11th, 2024, in order to draft a settlement
9 agreement with language agreeable to both Parties, coordinate payment, have both Parties sign
10 the agreement, and file dismissal documents. The Parties are requesting an extension of thirty
11 (30) days up to and including December 26, 2023, to file a Stipulation of Dismissal in order to
12 finalize certain terms of the settlement agreement.

15 WHEREFORE, the Parties respectfully request that the Court extend the time to file a
16 Stipulation of Dismissal by thirty (30) days, and for such other relief as is just and proper.

18 DATED: November 25, 2024

19 RESPECTFULLY SUBMITTED,

<p>21 <u>/s/ Anthony J. Perez</u> 22 Anthony J. Perez, Esq. 23 <i>PRO HAC VICE</i> 24 ANTHONY J. PEREZ LAW GROUP, PLLC 25 7950 W. Flagler Street, Suite 104 26 Miami, Florida 33144 27 Telephone: (786) 361-9909 28 Facsimile: (786) 687-0445 Emails: ajp@ajperezlawgroup.com & jr@ajperezlawgroup.com <i>Attorneys for Plaintiff John Meggs</i></p>	<p><u>/s/ Cynthia L. Alexander</u> Cynthia L. Alexander, Esq. Nevada Bar No. 6718 DICKINSON WRIGHT PLLC Alexis M. Taitel, Esq. Nevada Bar No. 16012 3883 Howard Hughes Parkway, Suite 800 Las Vegas, NV 89169 Tel: 702-550-4400 Fax: 844-670-6009 Email: CAlexander@dickinson-wright.com <i>Attorneys for Defendant Circa Hospitality Group II LLC d/b/a The D Las Vegas</i></p>
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ORDER

IT IS SO ORDERED.



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

DATED: November 26, 2024.