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14 *\*Pro hac vice application forthcoming*

15 *Attorneys for Defendant*  
 16 *MGM Resorts International*

17  
 18 **UNITED STATES DISTRICT COURT**  
 19 **DISTRICT OF NEVADA**

20 PAUL ZARI, individually and on behalf of all  
 21 others similarly situated

22 Plaintiff,

23 v.

24 MGM RESORTS INTERNATIONAL,

25 Defendant.

Case No. 2:23-cv-01777

**STIPULATION TO EXTEND TIME  
 TO FILE DEFENDANT'S  
 RESPONSE TO COMPLAINT  
 (FIRST REQUEST)**

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 27 Pursuant to LR IA 6-1, Plaintiff Paul Zari and Defendant MGM Resorts International  
 28 (“MGM”) (collectively, the “Parties”) respectfully stipulate that MGM’s time to respond to

1 the Complaint be extended from the current deadline of November 24, 2023, to and including  
2 December 12, 2023. This is the first stipulation for an extension of time to file MGM's  
3 responsive pleading.

4 Good cause exists to enlarge the time for MGM to respond to the Complaint.  
5 Between September 21 and November 10, 2023, eleven other related actions were filed  
6 against MGM in this and two other federal courts (the "Related Actions"). *See Owens v.*  
7 *MGM Resorts Int'l*, No. 2:23-cv-01480 (D. Nev.); *Kirwan v. MGM Resorts Int'l*, No. 2:23-  
8 cv-01481 (D. Nev.); *Zussman v. VICI Properties I LLC, et al.*, No. 2:23-cv-01537 (D. Nev.);  
9 *Lackey v. MGM Resorts Int'l*, No. 2:23-cv-01549 (D. Nev.); *Pircio v. MGM Resorts Int'l*,  
10 No. 2:23-cv-01550 (D. Nev.); *Terezo v. MGM Resorts Int'l*, No. 2:23-cv-01577 (D. Nev.);  
11 *Rundell v. MGM Resorts Int'l*, No. 2:23-cv-01698 (D. Nev.); *Bezak v. MGM Resorts Int'l*,  
12 No. 2:23-cv-01719 (D. Nev.); *Manson v. MGM Resorts Int'l*, No. 2:23-cv-01826 (D. Nev.);  
13 *Albrigo v. MGM Resorts Int'l*, No. 3:23-cv-01797 (S.D. Cal.); *Lassoff v. MGM Resorts Int'l*,  
14 *et al.*, No. 1:23-cv-20419 (D.N.J.).

15 MGM's counsel was only recently retained and requires additional time to review,  
16 investigate, and analyze the allegations in both the Complaint and the Related Actions.  
17 Moreover, based on the Parties' current understanding of the claims, there are significant  
18 overlaps between this action and the Related Actions. As such, additional time is required to  
19 permit time to meet and confer with the various parties to the Related Actions, evaluate the  
20 potential consolidation of the cases, and conserve judicial resources.

21 The Parties' request is made in good faith to enable MGM to complete an  
22 investigation into Plaintiff's claims. Moreover, this case is in its infancy, and this request  
23 will not prejudice any party.

24 **WHEREAS** the Parties respectfully request that the Court extend MGM's time to  
25 answer, move, or otherwise respond to the Complaint from November 24, 2023, to and  
26 including December 12, 2023.

1 Dated: November 13, 2023

Respectfully submitted,

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3  
4 /s/ J. Gerard Stranch IV

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5  
6 **IT IS SO ORDERED:**

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9 Hon. Brenda Weksler  
10 United States Magistrate Judge

11 DATED: 11/14/2023  
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