

1 Nathan R. Ring
2 NV State Bar No. 12078
2 **STRANCH, JENNINGS & GARVEY, PLLC**
3 3100 W. Charleston Boulevard, Suite 208
3 Las Vegas, NV 89102
4 Telephone: (725) 235-9750
4 lasvegas@stranchlaw.com

5 *Attorneys for Plaintiff and the Proposed Class*
5 [Additional Counsel listed on signature page]

6 Todd L. Bice
7 NV State Bar No. 4534
7 **PISANELLI BICE, PLLC**
8 400 S. 7th Street Suite 300
8 Las Vegas, NV 89101
9 Telephone: 702.214.2100
9 tlb@pisanellibice.com

10 Angela C. Agrusa (CA State Bar No 131337)*
11 **DLA PIPER LLP (US)**
11 2000 Avenue of the Stars
12 Suite 400 North Tower
12 Los Angeles, CA 90067-4735
13 Telephone: 310.595.3000
13 angela.agrusa@us.dlapiper.com

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

Case No. 2:23-cv-01777

22 Plaintiff,

23 v.
24 **STIPULATION TO EXTEND TIME**
25 **TO FILE DEFENDANT'S**
25 **RESPONSE TO COMPLAINT**
25 **(FIRST REQUEST)**

26
27 MGM RESORTS INTERNATIONAL,

28 Defendant.

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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

STIPULATION TO EXTEND TIME TO FILE DEFENDANT'S RESPONSE TO COMPLAINT
CASE NO. 2:23-CV-01777

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 1 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.

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STIPULATION TO EXTEND TIME TO FILE DEFENDANT'S RESPONSE TO COMPLAINT
CASE NO. 2:23-CV-01777

1 Dated: November 13, 2023

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4 Respectfully submitted,

5 /s/ J. Gerard Stranch IV
6

7 Nathan R. Ring
8 NV State Bar No. 12078
9 **STRANCH, JENNINGS & GARVEY,**
10 **PLLC**
11 3100 W. Charleston Boulevard, Suite 208
12 Las Vegas, NV 89102
13 Telephone: (725) 235-9750
14 lasvegas@stranchlaw.com

15 J. Gerard Stranch IV (Pro Hac Vice)
16 **STRANCH, JENNINGS & GARVEY,**
17 **PLLC**
18 The Freedom Center
19 223 Rosa L. Parks Avenue, Suite 200
20 Nashville, TN 37203
21 Telephone: (615) 254-8801
22 gstranch@stranchlaw.com

23 Lynn A. Toops (Pro Hac Vice)
24 Amina A. Thomas (Pro Hac Vice)
25 **COHEN & MALAD, LLP**
26 One Indiana Square, Suite 1400
27 Indianapolis, IN 46204
28 (317) 636-6481
ltoops@cohenandmalad.com
athomas@cohenandmalad.com

29
30
31 *Attorneys for Plaintiff and the Proposed*
32 *Class*

33 /s/ Todd L. Bice
34

35 Todd L. Bice
36 NV State Bar No. 4534
37 **PISANELLI BICE, PLLC**
38 400 S. 7th Street Suite 300
39 Las Vegas, NV 89101
40 Telephone: 702.214.2100
41 tlb@pisanellibice.com

42 Angela C. Agrusa
43 **DLA PIPER LLP (US)**
44 2000 Avenue of the Stars
45 Suite 400 North Tower
46 Los Angeles, CA 90067-4735

1 Telephone: 310.595.3000
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Attorneys for Defendant
MGM Resorts International

IT IS SO ORDERED:



Hon. Brenda Weksler
United States Magistrate Judge

DATED: 11/14/2023