

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**SAO**  
**RAMZY P. LADAH**  
Nevada Bar No. 11405  
**JOSEPH C. CHU**  
Nevada Bar No. 11082  
**LADAH LAW FIRM**  
517 S. Third Street  
Las Vegas, NV 89101  
litigation@ladahlaw.com  
T: 702.252.0055  
F: 702.248.0055  
*Attorney for Plaintiff*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

MARIA MATA,  
  
Plaintiff,  
  
vs.  
  
SMITH’S FOOD & DRUG CENTERS, INC.  
dba SMITH’S FOOD & DRUG; DOES I  
through XXX, inclusive and ROE BUSINESS  
ENTITIES I through XXX, inclusive,  
  
Defendants.

Case No.: 2:23-cv-01788-JAD-EJY

**STIPULATION AND ORDER TO  
EXTEND DEADLINE TO FILE JOINT  
PRE-TRIAL ORDER**

**(First Request)**

[ECF No. 14]

IT IS HEREBY STIPULATED by and between Plaintiff, MARIA MATA (“Plaintiff”), and Defendant, SMITH’S FOOD & DRUG CENTERS, INC. (“Defendant”), by and through their respective, undersigned counsel of record, that the deadline for the parties to file the Joint Pre-Trial Order be extended from November 27, 2024 to January 27, 2024.

This extension is sought to accommodate the upcoming trial schedule of Jerry Busby, Esq., counsel for Defendant. Specifically, Mr. Busby is in a trial which commenced on November 18, 2024, *Sinclair-Lewis v. Smith’s Food & Drug Centers, Inc.*, Case No. 2:20-cv-02063-MMD-MDC. Mr. Busby also recently completed another trial which commenced on November 4, 2024, *Golia-Huffman v. Smith’s Food & Drug Centers, Inc.*, Case No. 2:21-cv-01260-APG-EJY, and thus has not had sufficient time or opportunity to address matters pertinent to the instant pretrial order.



1 The parties respectfully submit that the aforesaid circumstances constitute good cause for  
2 the brief extension of time requested herein. This is the parties' first request for an extension of  
3 the pretrial order deadline.

4 This request is not being sought for reasons of undue delay or any other untoward  
5 purpose.

6 **IT IS HEREBY AGREED AND STIPULATED.**

7 DATED this 22nd day of November, 2024.

DATED this 2nd day of November, 2024.

8 **LADAH LAW FIRM**

**COOPER LEVENSON P.A.**

9 */s/ Ramzy P. Ladah, Esq.*

*/s/ Jerry Busby*

10 \_\_\_\_\_  
11 **RAMZY P. LADAH**  
12 **JOSEPH C. CHU**  
13 517 S. Third Street  
14 Las Vegas, NV 89101  
15 *Attorneys for Plaintiff*

\_\_\_\_\_

11 **JERRY BUSBY**  
12 3016 W. Charleston Boulevard, Suite 195  
13 Las Vegas, NV 89102  
14 *Attorneys for Defendant*

16 **ORDER**

17 Based upon the Stipulation of the parties, the Court having reviewed all pleadings and  
18 papers on file herein and good cause appearing:

19 **IT IS HEREBY ORDERED** that the deadline for parties to file a Joint Pre-Trial is  
20 extended to January 27, 2025.

21 Dated: November 25, 2024

22 By

23   
UNITED STATES DISTRICT COURT JUDGE

