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17 *Attorneys for Defendants MGM Resorts*
18 *International; Aria Resort & Casino LLC;*
19 *and Nevada Property 1, LLC*

18 UNITED STATES DISTRICT COURT
19 DISTRICT OF NEVADA

20 C.C., a pseudonymous individual,
21 Plaintiff,
22 v.
23 Rashid, *et al.*,
24 Defendants.

Case No. 2:23-cv-02056-GMN-BNW
STIPULATION AND ORDER
MODIFYING DEADLINE TO
RESPOND TO PLAINTIFF'S
SECOND AMENDED
COMPLAINT
(FIRST REQUEST)

1 Pursuant to LR IA 6-1, Plaintiff Chloe C. (“Plaintiff”) and Defendants MGM Resorts
2 International, Aria Resort & Casino LLC, and Nevada Property 1, LLC (“Defendants,” and
3 collectively, the “Parties”), by and through their respective counsel of record, hereby agree and
4 stipulate as follows:

5 On December 20, 2024, this Court dismissed Plaintiff’s TVPRA claims without prejudice
6 as to all of the Parties. (ECF No. 115).

7 That same day, this Court dismissed Plaintiff’s state law claims (N.R.S. § 41.1399 and
8 intentional infliction of emotional distress) with prejudice as to all of the Parties. (ECF No. 115).

9 The Court at the same time granted Plaintiff leave to amend her complaint by January 10,
10 2025. (ECF No. 115).

11 On January 10, 2025, Plaintiff filed a Motion for Leave to Amend her Complaint. (ECF
12 No. 117). Plaintiff’s proposed Second Amended Complaint brings beneficiary and perpetrator
13 liability claims under the TVPRA against all of the Parties. Plaintiff also seeks to add beneficiary
14 and perpetrator liability claims under the TVPRA against three new Defendants, including MGM
15 Grand Hotel, LLC.

16 On January 27, 2025, this Court granted Plaintiff’s Motion for Leave to Amend her
17 Complaint and directed the Clerk of Court to file Plaintiff’s Second Amended Complaint on the
18 docket. (ECF No. 124).

19 In the interests of judicial economy, the Parties respectfully stipulate that Defendants’ time
20 to respond to the Second Amended Complaint be extended to February 18, 2025. This is
21 Defendants first request to extend time to file a response to the complaint. Further, the Parties
22 respectfully stipulate that MGM Grand Hotel, LLC will similarly be permitted to respond to
23 Plaintiff’s Second Amended Complaint on February 18, 2025.

24 Good cause exists to enlarge the time for Defendants and MGM Grand Hotel, LLC to
25 respond to Plaintiff’s Complaint. This extension would allow the preservation of judicial and party
26 resources. This request is made in good faith and not for purposes of delay.

27 **WHEREAS** the Parties respectfully request that MGM Resorts International, Aria Resort
28

1 & Casino LLC, Nevada Property 1, LLC, and MGM Grand Hotel, LLC shall have until February
2 18, 2025 to answer, move, or otherwise respond to Plaintiff's Second Amended Complaint.

3
4 IT IS SO STIPULATED.

5 DATED this 28th day of January, 2025.

6 Respectfully submitted,

7 THE702FIRM

KNIGHT & RYAN PLLC

8 By: /s/ Geoffrey C. Parker

By: /s/ Robert A. Ryan

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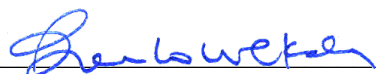
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IT IS SO ORDERED. Defendants MGM Resorts International, Aria Resort & Casino LLC, Nevada Property 1, LLC, and MGM Grand Hotel, LLC shall until February 18, 2025 to answer, move, or otherwise respond to Plaintiff's Second Amended Complaint.



UNITED STATES MAGISTRATE JUDGE

Dated: January 29, 2025

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 28, 2025, the foregoing **STIPULATION AND ORDER MODIFYING DEADLINE TO RESPOND TO PLAINTIFF’S SECOND AMENDED COMPLAINT** was filed using the Court’s CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

/s/ Jessica Malone

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