

BAILEY ♦ KENNEDY
8984 SPANISH RIDGE AVENUE
LAS VEGAS, NEVADA 89148-1302
702.562.8820

1 DENNIS L. KENNEDY
Nevada Bar No. 1462
2 JOSHUA P. GILMORE
Nevada Bar No. 11576
3 TAYLER D. BINGHAM
Nevada Bar No. 15870
4 **BAILEY ♦ KENNEDY**
8984 Spanish Ridge Avenue
5 Las Vegas, Nevada 89148-1302
Telephone: 702.562.8820
6 Facsimile: 702.562.8821
DKennedy@BaileyKennedy.com
7 JGilmore@BaileyKennedy.com
TBingham@BaileyKennedy.com
8

Attorneys for Defendants
9 NGAN VAN LE, INDIVIDUALLY AND AS
TRUSTEE FOR THE AD VITAM AUT
10 CULPAM TRUST; JML HOLDINGS, LLC,
AND JML SURGICAL CENTER LLC
11

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

12
13
14 JOCELYNE R. UY, an individual; and
WESTLEY U. VILLANUEVA, an individual,
15
16 Plaintiffs,

16 vs.

17 SANDY VAN, an individual; NGAN VAN LE,
an individual; SANDY VAN, LLC dba VAN
18 LAW FIRM, a Nevada Domestic Limited
Liability Company; VAN AND ASSOCIATES
19 LAW FIRM, PLLC, a Nevada Professional
Limited Liability Company; JML HOLDINGS,
20 LLC, a Nevada Domestic Limited-Liability
Company; NGAN VAN LE as Trustee for the AD
21 VITAM AUT CULPAM TRUST; JML
SURGICAL CENTER, LLC, a Nevada Domestic
22 Limited-Liability Company; DOES I through X;
and ROE CORPORATIONS 1 through X,
23 inclusive,
24
25 Defendants.

Case No. 2:24-cv-00599-GMN-DJA

**STIPULATION AND ORDER
EXTENDING DEADLINE FOR REPLY
TO RESPONSE TO LE DEFENDANTS'
MOTION TO DISMISS
(FIRST REQUEST)**

26 Defendants, Sandy Van, Sandy Van, LLC dba Van Law Firm, and Van and Associates Law
27 Firm, PLLC (collectively, the “Van Defendants”), by and through their counsel; Defendants, Ngan
28 Van Le, JML Holdings, LLC, Ad Vitam Aut Culpam Trust, and JML Surgical Center, LLC

1 (collectively, the “Le Defendants”), by and through their counsel; and Plaintiffs, Jocelyne R. Uy and
2 Westley U. Villanueva (collectively, “Plaintiffs”), by and through their counsel, hereby stipulate and
3 agree as follows:

4 1. On April 17, 2024, the Le Defendants filed a Motion to Dismiss the First Amended
5 Complaint [ECF No. 12] (the “Le 12(b)(6) Motion”);

6 2. On May 1, 2024, Plaintiffs filed a Response [ECF No. 19] to the Le 12(b)(6) Motion;

7 3. The Le Defendants presently have until May 8, 2024, to file a Reply to the Response
8 to the Le 12(b)(6) Motion;

9 4. Due to work-related scheduling conflicts for the Le Defendants’ counsel, including a
10 Fed. R. Civ. P. 12(b)(6) motion to dismiss in a RICO case, a confidential mediation statement in
11 another RICO case, a petition for rehearing in an appeal pending before the Nevada Supreme Court,
12 and extensive written discovery and supplemental disclosure obligations in two state court cases, and
13 based on the number of arguments to be addressed by the Le Defendants in their Reply to Plaintiffs’
14 Response to the Le 12(b)(6) Motion, and as a matter of professional courtesy extended by Plaintiffs’
15 counsel, the Le Defendants shall have until May 17, 2024 to file a Reply to the Response to the Le
16 12(b)(6) Motion; and

17 ///

18 ///

19 ///

20

21

22

23

24

25

26

27

28

1 5. This is the first request to extend the deadline for filing the Reply to the Response to
2 the Le 12(b)(6) Motion and is made in good faith and not for purposes of delay.

3 Dated this 7th day of May, 2024.

Dated this 7th day of May, 2024.

4 BAILEY ♦ KENNEDY

JEPSEN LAW, PLLC

5 By: /s/ Joshua P. Gilmore
6 DENNIS L. KENNEDY
7 JOSHUA P. GILMORE
8 TAYLER D. BINGHAM

By: /s/ Kendra Jepsen
KENDRA JEPSEN (Bar No. 14065)

- and -

8 Attorneys for Defendants,
9 NGAN VAN LE, INDIVIDUALLY AND AS
10 TRUSTEE FOR THE AD VITAM AUT
11 CULPAM TRUST; JML HOLDINGS, LLC,
12 AND JML SURGICAL CENTER LLC

SILVIA U. VILLANUEVA (Bar No. 13608)
ADLER & VILLANUEVA, LLC

Attorneys for Plaintiffs,
JOCELYN R. UY AND WESTLEY U.
VILLANUEVA

11 Dated this 7th day of May, 2024.

12 WILSON, ELSER, MOSKOWITZ,
13 EDELMAN & DICKER LLP

14 By: /s/ Sheri M. Thome
15 SHERI M. THOME (Bar No. 8657)
16 NICHOLAS F. ADAMS (Bar No. 14813)

17 Attorneys for Defendants,
18 SANDY VAN, SANDY VAN, LLC DBA
19 VAN LAW FIRM, AND VAN AND
20 ASSOCIATES LAW FIRM, PLLC

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE

Dated: May 8, 2024