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6	Attorneys for Defendant		
7	KEOLIŠ TRANSIT SERVICES, LLC		
8	UNITED STATES DISTRICT COURT		
9	DISTRICT OF NEVADA		
10			
11	KEITH BALZARINI,	Case No. 2:24-cv-02054 -RFB-DJA	
12	Plaintiff,	STIPULATION AND ORDER TO CONTINUE DEFENDANT KEOLIS	
13	V.	TRANSIT SERVICES, LLC'S RESPONSIVE PLEADING DEADLINE	
14	KEOLIS TRANSIT SERVICES, LLC, a Delaware Nevada Limited Liability Company,		
15	Defendant.		
16	Plaintiff KEITH BALZARINI ("Plaintiff")	and Defendant KEOLIS TRANSIT SERVICES,	
17	LLC ("Defendant") (collectively, the "Parties") hereby stipulate, agree, and make joint application to		
18	continue Defendant's current responsive pleading deadline set forth in the waiver of service filed		
19	herein.		
20	This is the first motion or stipulation to extend time for a party to file a responsive pleading,		
21	motion or other paper or take other action in this matter.		
22	Pursuant to Local Rule IA 6-1, the Parties indicate that holiday travel of client contacts for		
23	Defendant and Defendant's counsel have slowed the review and filing of the responsive pleadings.		
24	Specifically, lead counsel for Defendant is traveling out of the country at the moment. Additionally,		
25	Defendant intend to concurrently file motions for admission <i>pro hac vice</i> of the attorneys who will		
26	be primarily responsible for this matter.		
27	1 J		
R 28 N, P.C. Palm	4913-1731-0220.1 / 112699-1173		

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1	Counsel for Defendant realized the nature of the delay too late to make necessary		
2	arrangements further in advance of the deadline for this stipulation. Defendant's counsel apologizes		
3	to the Court for the delay in filing this stipulation.		
4	Dated: January 2, 2025		
5	L	LITTLER MENDELSON, P.C.	
6			
7	K K	<u>s/ Karyn M. Taylor</u> Karyn M. Taylor	
8	A K	Attorneys for Defendant KEOLIS TRANSIT SERVICES, LLC	
10	Dated: January 2, 2025	AW OFFICES OOF MICHAEL P. BALABAN	
11		ATT OTTICES OUT MICHAELT. BILLIBRIT	
12		s/ Michael P. Balaban	
13	N	Michael P. Balaban	
14	A K	Attorneys for Plaintiff KEITH BALZARINI	
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## [PROPOSED]-ORDER

The Court, having reviewed the stipulation of the Plaintiff Keith Balzarini and Defendant Keolis Transit Services, LLC and finding good cause for the same, orders that Defendant Keolis Transit Services, LLC's deadline for filing its responsive pleading is continued from January 3, 2025 to January 17, 2025.

IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

**DATED:** \_1/3/2025

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