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11 *Attorneys for Defendants*  
12 *Ntooitive Digital, LLC, Vikas*  
13 *Khorana, and Brian Johnson*

14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

16 ROWENA NAVARRETTE, an individual,

17 Plaintiff,

18 vs.

19 NTOOITIVE DIGITAL, LLC, a domestic  
20 limited-liability company, VIKAS KHORANA,  
an individual, BRIAN JOHNSON, an  
individual, DOES 1-20, inclusive,

21 Defendant.

Case No. 2:24-cv-02136-RFB-DJA

**STIPULATION AND ORDER TO  
EXTEND DEADLINE FOR  
DEFENDANTS TO RESPOND TO  
PLAINTIFF'S COMPLAINT**

**(FIRST REQUEST)**

22 IT IS HEREBY STIPULATED by and between Plaintiff Rowena Navarrette, ("Plaintiff"),  
23 by and through her counsel, the Bourassa Law Group, and Defendants, Ntooitive Digital, LLC,  
24 Vikas Khorana and Brian Johnson ("Defendants"), by and through their counsel, the law firm of  
25 Jackson Lewis P.C., that Defendants shall have an extension up to and including December 6, 2024,  
26 in which to file their responses to Plaintiff's Complaint. This Stipulation is submitted and based  
upon the following:

27 1. Plaintiff filed her Complaint on October 21, 2024 in the District Court, Clark County  
28 Nevada, Case No. A-24-904336-C. The Summons and Complaint were served on Defendants

1 Ntooitive Digital, LLC and Vikas Khorana on or about October 25, 2024, and on Defendant Brian  
2 Johnson on or about November 1, 2024.

3 2. On November 15, 2024, the Defendants filed a Notice to Federal Court of Removal  
4 of Civil Action from State Court, Case No. 2:24-cv-02136-RFB-DJA.

5 3. Undersigned Defense Counsel has been unable to complete draft responses for all  
6 the Defendants as Counsel became unexpectedly ill with the flu on November 5, 2025, and was out  
7 of the office for over a week due to illness and was unable to work on the responses during that  
8 time. While Counsel had anticipated assistance from out of state colleagues, their Pro Hac Vice  
9 applications were delayed as the Court deferred a ruling on their applications requesting certain  
10 sections be completed or clarified by December 5, 2024. (ECF No. 6)

11 4. Given Defense Counsels' recent absence due to illness, and the time necessary to  
12 prepare responses to the Complaint, Defendants need additional time. Further, next week is the  
13 Thanksgiving Holiday when the parties and their counsels will be away with their families for the  
14 Holiday.

15 5. Thus, the parties hereby stipulate to extend the deadline to December 6, 2024, for  
16 Defendants to file responses to the Complaint.

17 6. This is the first request for an extension of time for Defendants to file responses to  
18 Plaintiff's Complaint.

19 7. This Stipulation is made in good faith and not for the purpose of delay.

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1 8. Nothing in this Stipulation and Order shall operate to waive, relinquish, or impair  
2 any claim, defense, objection, or right of any party in this case. Further, nothing in this Stipulation  
3 and Order shall be construed as an admission of or consent to the merit or validity of any claim,  
4 defense, objection, or right by any party in this case.

5 Dated this 22nd day of November, 2024.

6 THE BOURASSA LAW GROUP

JACKSON LEWIS P.C.

7  
8 /s/ Jennifer A. Fornetti

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/s/ Deverie J. Christensen

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27 *NTOOITIVE DIGITAL, LLC, Victor*  
28 *Vikas and Brian Johnson*

**ORDER**

IT IS SO ORDERED.

  
United States Magistrate Judge

Dated: 11/25/2024

4880-7085-2863, v. 1