

1 **JEFFERY A. BENDAVID, ESQ.**  
 Nevada Bar No. 6220  
 2 jbendavid@bendavidfirm.com  
**JACQUELINE VOKOUN, ESQ.**  
 3 Nevada Bar No. 16400  
 jvokoun@bendavidfirm.com  
 4 **BENDAVID LAW**  
 7301 Peak Drive, Suite 150  
 5 Las Vegas, Nevada 89128  
 (702) 385-6114  
 6 jbendavid@bendavidfirm.com  
*Attorneys for Defendants*

7  
 8 **IN THE UNITED STATES DISTRICT COURT**  
 9 **FOR THE DISTRICT OF NEVADA**

10 TRINITY HAYES, on behalf of herself  
 and those similarly situated

11 Plaintiff,

12 vs.

13 RUSSELL ROAD FOOD AND  
 14 BEVERAGE, LLC d/b/a CRAZY  
 HORSE 3 GENTLEMAN’S CLUB, and  
 15 NANDO SOSTILLIO in his individual  
 capacity,

16 Defendants.  
 17

Case No. 2:24-CV-02341-CDS-NJK

**JOINT STIPULATION TO  
 EXTEND TIME TO FILE  
 RESPONSE TO PLAINTIFF’S  
 COMPLAINT**

**(Second Request)**

18 Plaintiff TRINITY HAYES (“Plaintiff”) and Defendants RUSSELL ROAD  
 19 FOOD AND BEVERAGE, LLC d/b/a CRAZY HORSE 3 GENTLEMAN’S CLUB,  
 20 and NANDO SOSTILLIO (“Defendants”) by and through their respective attorneys,  
 21 hereby stipulate and agree as follows:

22 1. This is the Second Stipulation for Extension of Time for filing a  
 23 Response to Plaintiff’s Complaint.

24 2. Pursuant to Local Rule IA 6-1(a), the Parties request this extension in  
 25 order to continue their discussions to resolve potential jurisdictional issues in this  
 26 matter.

27 //

28 //

1           3.     Accordingly, the Parties respectfully request that the deadline for  
2 Defendants to file a response to Plaintiff's Complaint be extended to March 18, 2025.

3           IT IS SO STIPULATED.

4           DATED: March 4, 2025

5                           **THE LEACH FIRM**

6                           /s/ T'Keara N. Watson, Esq.

7                           **CARLOS LEACH, ESQ. (Pro Hac Vice)**

8                           Florida Bar No. 540021

9                           **T'KEARA N. WATSON, ESQ. (Pro Hac Vice)**

10                          Florida Bar No. 1018265

11                          1560 N. Orange Ave., Ste 600

12                          Winter Park, FL 32789

13                          **F. TRAVIS BUCHANAN, ESQ.**

14                          Nevada Bar No. 9371

15                          **F. TRAVIS BUCHANAN, ESQ., & ASSOC.**

16                          701 East Bridger Ave., Suite 540

17                          Las Vegas, NV 89101

18                          (702) 331-5478

19                          Attorneys for Plaintiff

20           DATED: March 4, 2025

21                           **BENDAVID LAW**

22                           /s/ Jeffery A. Bendavid, Esq.

23                           **JEFFERY A. BENDAVID, ESQ.**

24                           Nevada Bar No. 6220

25                           **JACQUELINE VOKOUN, ESQ.**

26                           Nevada Bar No. 16400

27                           7301 Peak Dr., Suite 150

28                           Las Vegas, Nevada 89128

(702) 385-6114

Attorneys for Defendants

IT IS SO ORDERED:

  
\_\_\_\_\_  
**NANCY J. KOPPE**  
**UNITED STATES MAGISTRATE JUDGE**

DATED: March 5, 2025