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Attorneys for Plaintiff  
JASHYUA THOMAS

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

JASHYUA THOMAS, an individual,  
  
Plaintiff,  
  
vs.  
  
FOUNDEVER OPERATING  
CORPORATION, a corporation, and DOES  
1-50, inclusive,  
  
Defendants.

Case No. 2:25-cv-152-APG-BNW

**STIPULATION TO RESCHEDULE  
DATE OF EARLY NEUTRAL  
EVALUATION  
(FIRST REQUEST)**

1 Plaintiff JASHYUA THOMAS (“Plaintiff”) and Defendant FOUNDEVER OPERATING  
2 CORPORATION (“Defendant”), by and through their undersigned counsel, hereby agree and  
3 stipulate to reschedule the date for the Early Neutral Evaluation (ENE) in this matter, currently set for  
4 April 28, 2025 at 10:00 a.m. with Magistrate Judge Daniel J. Albregts. Plaintiff’s counsel is unavailable  
5 on the current date due to previously arranged travel plans. The Parties are both available on either May  
6 19, 2025 or May 20, 2025, and propose these alternate dates for the ENE. If Judge Albregts is not  
7 available on these dates, the Parties request that the ENE be rescheduled to another available date.  
8

9 This is the first request to reschedule the ENE in this case. This request is made in good faith and  
10 not for the purpose of delay.

11 Dated: March 10, 2025

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12 Respectfully submitted,

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13  
14  
15 /s/ Kathryn L. Bain

/s/ Luke W. Molleck

16 Kathryn L. Bain  
17 Bain Mazza & Debski LLP  
18 Attorneys for Plaintiff  
Jashyua Thomas

Roger L. Grangenett II  
Luke W. Molleck  
Little Mendelson, P.C.  
Attorneys for Defendant  
Foundever Operating Corporation

19  
20 IT IS SO ORDERED. The Early Neutral Evaluation scheduled for April 28, 2025 is VACATED  
21 and **RESET** for **May 19, 2025 at 10:00 a.m.**

22 IT IS FURTHER ORDERED that the written evaluation statements are due by 4:00 p.m. on  
23 May 12, 2025.

24 IT IS FURTHER ORDERED that all other provisions of the Court's order (ECF No. 9) shall  
25 remain in effect.

26 DATED: 3/11/2025

  
27 DANIEL J. ALBREGTS  
28 UNITED STATES MAGISTRATE JUDGE