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7 *Attorney for Defendants Jerritt Canyon Gold LLC  
8 and FM US Holdings Limited*

9  
10 IN THE UNITED STATES DISTRICT COURT  
11 FOR THE DISTRICT OF NEVADA

12 NICANDRO ROSALES, Individually and  
13 On Behalf of Others Similarly Situated,

14 Plaintiff,

vs.

JERRITT CANYON GOLD LLC and FM  
15 US HOLDINGS LIMITED,

Defendants.

Case No. 2:25-cv-00269-GMN-MDC

**STIPULATION AND ~~Proposed~~ ORDER TO  
EXTEND DEADLINE FOR DEFENDANTS  
TO FILE RESPONSIVE PLEADING TO  
COMPLAINT**

**(First Request)**

16 Plaintiff Nicandro Rosales (“Plaintiff”) and Defendants Jerritt Canyon Gold LLC and FM  
17 US Holdings Limited (“Defendants” and, together with Plaintiff, the “Parties”), by and through  
18 their undersigned counsels of record, hereby agree and stipulate to extend the deadline for  
19 Defendants to file a responsive pleading to Plaintiff’s Complaint on file herein to and including  
20 April 22, 2025. During the stipulated extension, the Putative Class Members will not be prejudiced.  
21 The Parties agree that the statute of limitations under the Fair Labor Standards Act will be tolled  
22 for the Putative Class Members, as defined in the Complaint, from the date of the filing of this  
23 extension through April 22, 2025. Nothing herein constitutes an admission by Defendants regarding  
24 the defined class, if any, nor does the tolling apply to the statute of limitations for the underlying  
claims in the Complaint.

25 This is the first request by Defendants for an extension of this deadline. This Stipulation is  
26 made in good faith and not for the purposes of delay, but rather to allow the Parties to engage in

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1 settlement negotiations to attempt to resolve all claims and conserve resources during said  
2 negotiations.

3 Dated: March 10, 2025.

4 RODRIGUEZ LAW OFFICES, P.C.

5 */s/ Esther C. Rodriguez*

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17 *Attorneys for Plaintiff*

18 \* *Pro Hac Vice Applications Pending*

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Dated: March 10, 2025.

PARSONS BEHLE & LATIMER

*/s/ Sarah Ferguson*

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*Attorney for Defendants*

IT IS SO ORDERED

  
Hon. Maximillano D. Couvillier III  
United States Magistrate Judge  
DATED: 3/11/2025