

1 Sarah Ferguson (NSBN 14515)
 Parsons Behle & Latimer
 2 50 W. Liberty Street, Suite 750
 Reno, Nevada 89501
 3 Telephone: (775) 323-1601
 sferguson@parsonsbehle.com

4 *Attorney for Defendants Jerritt Canyon Gold LLC*
 5 *and FM US Holdings Limited*

6 IN THE UNITED STATES DISTRICT COURT

7 FOR THE DISTRICT OF NEVADA

8 NICANDRO ROSALES, Individually and
 On Behalf of Others Similarly Situated,

9 Plaintiff,

10 vs.

11 JERRITT CANYON GOLD LLC and FM
 12 US HOLDINGS LIMITED,

13 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)

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

27 ///

28 ///

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

3 Dated: March 10, 2025.

Dated: March 10, 2025.

4 RODRIGUEZ LAW OFFICES, P.C.

PARSONS BEHLE & LATIMER

5 /s/ Esther C. Rodriguez

6 Esther C. Rodriguez (NSBN 006473)
7 10161 Park Run Drive, Suite 150
8 Las Vegas, NV 89145
9 Telephone: (702) 320-8400
10 info@rodriguezlaw.com

/s/ Sarah Ferguson

Sarah Ferguson (NSBN 14515)
50 W. Liberty Street, Suite 750
Reno, NV 89501
Telephone: (775) 323-1601
sferguson@parsonsbehle.com

-and-

9 Michael A. Josephson, TX Bar No. 24014780*
10 Andrew W. Dunlap, TX Bar No. 24078444*
11 Josephson Dunlap LLP
12 11 Greenway Plaza, Suite 3050
13 Houston, TX 77046
14 Telephone: (713) 352-1100
15 mjosephson@mybackwages.com
16 adunlap@mybackwages.com

Attorney for Defendants

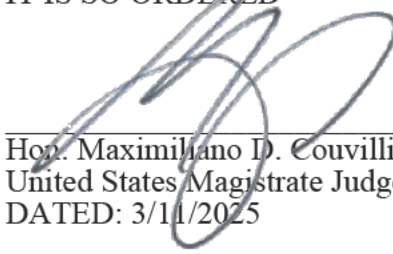
-and-

17 Richard J. (Rex) Burch, TX Bar No. 24001807*
18 Bruckner Burch PLLC
19 11 Greenway Plaza, Suite 3025
20 Houston, TX 77046
21 Telephone: (713) 877-8788
22 rburch@brucknerburch.com

Attorneys for Plaintiff

* *Pro Hac Vice Applications Pending*

IT IS SO ORDERED



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