Case 3:13-cv-00168-HDM-VPC Document 7 Filed 06/27/13 Page 1 of 4 FILED ENTERED MARGARET G. FOLEY RECEIVED Nevada Bar No. 7703 COUNSEL/PARTIES OF RECOND RACHEL N. SOLOW Nevada Bar No. 9694 SERVED ON JUL 0 1 2013 LEWIS BRISBOIS BISGAARD & SMITH LL 6385 S. Rainbow Boulevard, Suite 600 Las Vegas, Nevada 89118 CLERK US DISTRICT COUR 702.893.3383 DISTRICT OF NEVADA FAX: 702.893.3789 Attorneys for Paragon Defendants 6 7 UNITED STATES DISTRICT COURT 8 DISTRICT OF NEVADA 9 CASE NO. 3:13-cv-00168-HDM-VPC ISSAC AVENDANO, an Individual; and ROLANDO DUENAS, an 11 STIPULATION AND [PROPOSED] Individual, ORDER EXTENDING TIME TO 12 RESPOND Plaintiffs, 13 (First Request) 14 VS. 15 SECURITY CONSULTANTS GROUP, INC., a corporation; UNITED 16 **GOVERNMENT SECURITY** 17 OFFICERS OF AMERICA, 18 INTERNATIONAL UNION, a labor organization; UNITED 19 **GOVERNMENT SECURITY** 20 OFFICERS OF AMERICA, LOCAL 283, a labor organization; PARAGON 21 SYSTEMS, INC., a corporation; and 22 SECURITAS SECURITY SERVICES USA, INC., a corporation, 23 Defendants. 24 25 26 /// 27 / / / 28 3:13-cv-00168-HDM-VPC 4825-3217-3844.1 STIPULATION AND [PROPOSED] ORDER EXTENDING TIME TO RESPOND

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## STIPULATION AND [PROPOSED] ORDER EXTENDING TIME TO RESPOND (First Request)

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IT IS HEREBY STIPULATED between Plaintiffs ISSAC AVENDANO and ROLANDO DUENAS, by and through their counsel of record, John A. Tucker Co., L.P.A., and Ian E. Silverberg, Esq., P.C.; and Defendants SECURITY CONSULTANTS GROUP, INC.; PARAGON SYSTEMS, INC.; and SECURITAS SECURITY SERVICES USA, INC. (collectively, the "Paragon Defendants"); by and through their attorneys of record, Lewis Brisbois Bisgaard & Smith, LLP, that the time for the Paragon Defendants to respond to Plaintiffs' Complaint in accordance with Fed. R. Civ. P. 12 in this matter be extended ten (10) days from July 1, 2013, to and including Thursday, July 11, 2013.

This stipulation is entered to allow counsel sufficient time to consult with Paragon Defendants, who have offices outside of Las Vegas, Nevada.

**DATED** this 27<sup>th</sup> day of June, 2013.

**DATED** this 27<sup>th</sup> day of June, 2013.

JOHN A. TUCKER CO., L.P.A

LEWIS BRISBOIS BISGAARD & SMITH LLP

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\_/s/ John A. Tucker\_\_\_\_\_ JOHN A. TUCKER, ESQ.

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STIPULATION AND [PROPOSED] ORDER EXTENDING TIME TO RESPOND

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## **ORDER**

Upon stipulation of the aforementioned parties, and good cause appearing,

IT IS HEREBY ORDERED that the time for the Paragon Defendants to respond to Plaintiffs' Complaint in accordance with Fed. R. Civ. P. 12 in this matter is hereby extended ten (10) days from July 1, 2013, to and including Thursday, July 11, 2013.

DATED this / day of \_(

2013.

United States Magistrate Judge

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**CERTIFICATE OF SERVICE** 1 Pursuant to Fed. R. Civ. P. 5(b), I hereby certify that I am an employee of 2 LEWIS BRISBOIS BISGAARD & SMITH LLP and that on this 27th day of June, 3 2013, I did cause a true and correct copy of the foregoing **STIPULATION AND** 4 [PROPOSED] ORDER EXTENDING TIME TO RESPOND (First Request) to 5 be served via the CM/ECF filing system to all parties on the service list. Ian E. Silverberg, Esq. P.C. John A. Tucker, Esq. JOHN A. TUCKER CO., L.P.A. 227 Clay Street Reno, NV 89501 11367 Lair Road NE Tel: 775.348.1836 Alliance, OH 44601 9 Fax: 775.348.6331 Tel: 330.935.2530 10 Fax: 330.935.2540 Counsel for Plaintiffs Counsel for Plaintiffs 11 12 13 14 15 By /s/ Peggy Kurilla 16 An Employee of LEWIS BRISBOIS BISGAARD & SMITH LLP 17 18 19 20 21 22 23 24 25 26 27 28

LEWIS BRISBOIS BISGAARD & SMITH LLP

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