1	Todd L. Bice, Esq., Bar No. 4534		
2	TLB@pisanellibice.com Dustun H. Holmes, Esq., Bar No. 12776 DHH@pisanellibice.com Robert A. Ryan, Esq., Bar No. 12084 RR@pisanellibice.com PISANELLI BICE PLLC		
3			
4			
5	400 South 7th Street, Suite 300 Las Vegas, Nevada 89101		
6	Telephone: 702.214.2100 Facsimile: 702.214.2100		
7	Attorneys for Pioneer Hotel, Inc.,		
8	Mandalay Resort Group, MGM Resorts International, MSE Investments, Inc., Gold Strike Investments, Inc., Newcastle Corp., and Ramparts, Inc.		
9			
10	UNITED STATES DISTRICT COURT		
11	DISTRICT OF NEVADA		
12	SIERRA DEVELOPMENT CO. d/b/a CLUB CAL NEVA,	CASE NO. 3:13-cv-00602-RTB-VPC	
13	Plaintiff,	STIPULATION AND [PROPOSED]	
14	V.	ORDER FOR EXTENSION TO FILE MOTION FOR ATTORNEYS' FEES AND	
15	CHARTWELL ADVISORY GROUP, LTD.	COSTS AND TO SUBMIT BILL OF COSTS	
16	Defendant.	(SIXTH REQUEST)	
17	CHARTWELL ADVISORY GROUP, LTD.,		
18	Counterclaim Plaintiff,		
19	V. SIEDDA DEVELODMENT CO. et al.		
20	SIERRA DEVELOPMENT CO., et al.,		
21	Counterclaim Defendants.		
22			
23	Defendant/Counterclaimant Chartwell Advisory Group, LTD. ("Chartwell"), Counterclain		
24	Defendant Pioneer Hotel, Inc. ("Pioneer"); Counterclaim Defendants Mandalay Resort Group		
25	MGM Resorts International, MSE Investments, Inc., Gold Strike Investments, Inc.		
26	Newcastle Corp. and Ramparts, Inc. (collectively, the "Mandalay Parties"); Counterclaim		
27	Defendants Harrah's Las Vegas, LLC, Harrah's Laughlin, LLC and Rio Properties, LLC		
	i i		

28 (collectively, the "Harrah's Parties" and together with Pioneer and the Mandalay Parties as

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

"Counterclaim Defendants"), by and through their respective counsel, hereby stipulate and agree as Follows:

- 1. On July 6, 2018, this Court entered its Memorandum Decision following the Bench Trial in this case. [ECF No. 689]
- 2. That same day, the clerk of the Court entered Judgment in accordance with this Court's Memorandum Decision. [ECF No. 690]
- 3. Based on these dates, any motions for attorneys' fees and costs pursuant to Fed. R. Civ. P. 54(d) and/or requests for taxable costs under Local Rule 54-1 would have been due within fourteen (14) days, or by July 20, 2018.
- 4. On July 19, 2018, the Parties filed a Stipulation and Proposed Order to extend the July 20, 2018 deadline to August 3, 2018 so the Parties could explore the possibility of resolution [ECF No. 691].
  - 5. The Court granted this Stipulation on July 27, 2018. [ECF No. 695]
- 6. On August 1, 2018, the parties sought an additional two week extension of the August 3, 2018 date as negotiations were ongoing. [ECF No. 692]
- 7. Again, on August 15, 2018, the parties sought another two week extension to August 31, 2018. [ECF No. 698]
- 8. On August 30, 2018, the parties sought an additional two week extension to September 14, 2018 (the "August 30 Stipulation"). [ECF No. 703]
- On September 4, 2018, this Court granted the parties August 30 Stipulation. 9. [ECF No. 704]
- 10. On September 13, 2018, the parties sought another two week extension to September 28, 2018. [ECF No. 707]
- 11. The Parties have reached a resolution, but out of an abundance of caution, the parties seek to extend the deadline for an additional two weeks in order to finalize the settlement documents.
- 12. As such, the parties request an additional two-week extension of time to file any motions for attorneys' fees and costs under Fed. R. Civ. P. 54(d) and/or any requests for taxable

1	costs under Local Rule 54-1, such that all such motions and requests would be due on or before		
2	October 12, 2018.		
3	13. The Parties request this extension	in good faith and not for any dilatory motive.	
4	DATED this 28th day of September, 2018.		
5	PISANELLI BICE PLLC	DILWORTH PAXSON LLP	
6	By: /s/ Todd L. Bice	By: /s/ Joshua D. Wolson	
7	Todd L. Bice, Esq., Bar No. 4534 Dustun H. Holmes, Esq., Bar No. 12776 Robert A. Ryan, Esq., Bar No. 12084	Joshua D. Wolson, Esq. ( <i>pro hac vice</i> ) 1500 Market Street, Suite 3500E Philadelphia, PA 19102	
8	400 South 7 <sup>th</sup> Street, Suite 300 Las Vegas, Nevada 89101	Calvin R.X. Dunlap, Esq., Bar No. 2111	
9 10	Attorneys for Counterclaim Defendants Mandalay Resort Group, MGM Resorts	Monique Laxalt, Esq., Bar No. 1969 DUNLAP & LAXALT 537 Ralston Street Reno, Nevada 89503	
11	International, MSE Investments, Inc., Gold Strike Investments, Inc., Newcastle Corp., and	Attorneys for Chartwell Advisory Group, Ltd.	
12	Ramparts, Inc.	Thiorneys for Chartwell Havisory Group, Lia.	
13	DICKINSON WRIGHT PLLC		
14	By: /s/ Michael Feder		
15	Michael N. Feder, Esq., Bar No. 7332 Joel Z. Schwarz, Esq., Bar No. 9181		
16	8363 West Sunset Road, Suite 200 Las Vegas, Nevada 89113		
17	_		
18	Attorneys for Caesars Entertainment Corporation, Harrah's Las Vegas, LLC,		
19	Harrah's Laughlin, LLC, Rio Properties, LLC, Golden Nugget, Inc., GNLV Corp., and Golden		
20	Nugget Hotels and Casinos		
21			
22			
<ul><li>23</li><li>24</li></ul>			
25			
26			
27			
28			
20			

## PISANELLI BICE 00 South 7th Street, Suite 300 Las Vegas, Nevada 89101

## **ORDER**

Based upon the Stipulation of the Parties, and good cause appearing therefore, IT IS HEREBY ORDERED:

The Deadline for the Parties to submit any motions for attorneys' fees and costs pursuant to Fed. R. Civ. P. 54(d) and/or any requests for costs pursuant to Local Rule 54-1 shall be extended to

October 12, 2018. No more extensions.

IT IS SO ORDERED.

U.S. DISTRICT COURT JUDGE

DATED: October 3, 2018