

1 LESLEY B. MILLER
 Nevada Bar No. 7987
 2 KAEMPFER CROWELL
 1980 Festival Plaza Drive, Suite 650
 3 Las Vegas, Nevada 89135
 Telephone: (702) 792-7000
 4 Fax: (702) 796-7181
lmiller@kcnvlaw.com
 5 **Attorney for Defendants**
Paula Pritchard, Kathleen Robbins, Ian Murray,
 6 *Judy Murray, Sandy Chambers, and Kerry Dean*

7 UNITED STATES DISTRICT COURT
 8 DISTRICT OF NEVADA

9 ENRIQUE MARTINEZ, *et al.*,
 10 Plaintiffs,
 vs.
 11 MXI CORP., *et al.*,
 12 Defendants.

Case No.: 3:15-cv-00243-MMD-
 VPC

**STIPULATION TO EXTEND
 TIME TO RESPOND TO FIRST
 AMENDED CLASS ACTION
 COMPLAINT**

14 IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs ENRIQUE
 15 MARTINEZ, MICHELLE MARTINEZ, and SUNSHINE MARTINEZ-VALDEZ, BECKIE
 16 LOBB, and PAULA WILSON (COLLECTIVELY, "Plaintiffs"), and Defendants PAULA
 17 PRITCHARD, KATHLEEN ROBBINS, IAN MURRAY, JUDY MURRAY, SANDY
 18 CHAMBERS, and KERRY DEAN (collectively the "Pritchard Defendants"), by and through
 19 their respective counsel of record, that, due to a settlement-in-principle being reached between
 20 the parties regarding Plaintiffs' individual and class claims, the Pritchard Defendants' deadline to
 21 respond to the First Amended Class Action Complaint [Dkt. 140] may be extended until fifteen
 22 (15) days from the Court's denial of Plaintiff's motion for preliminary or final approval of the
 23 settlement agreement under Rule 23(e), Federal Rules of Civil Procedure. This Stipulation is
 24 made in good faith.

KAEMPFER CROWELL RENSHAW
 GRONAUER & FIORENTINO
 1980 Festival Plaza Drive
 Suite 650
 Las Vegas, Nevada 89135

1 DICKINSON WRIGHT, PLLC
2 By: /s/R. Adam Swick
3 John P. Desmond (NV Bar No. 5618)
4 Justin J. Bustos (NV Bar No. 10320)
5 100 West Liberty St., Suite 940
6 Reno, NV 89501
7 Tel.: (775) 343-7500
8 Fax: (775) 786-0131
9 E-mail: JDesmond@dickinson-wright.com

7 R. Adam Swick (admitted pro hac vice)
8 REID COLLINS & TSAI LLP
9 1301 S. Capital of Texas Hwy.
10 Suite C300
11 Austin, TX 78746
12 Tel.: (512) 647-6100
13 Fax: (512) 647-6129
14 E-mail: aswick@rctlegal.com
15 ***Attorneys for Plaintiffs Enrique***
16 ***Martinez, Michelle Martinez,***
17 ***Sunshine Martinez, Beckie Lobb***
18 ***and Paula Wilson***

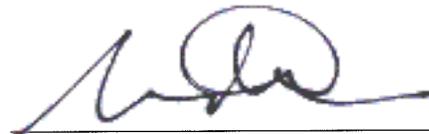
KAEMPFER CROWELL

By: /s/Lesley B. Miller

Lesley B. Miller, Esq. (NV Bar No. 7987)
1980 Festival Plaza Drive, Suite 650
Las Vegas, Nevada 89135
Tel.: (702) 792-7000
Fax: (702) 796-7181
E-mail: lmiller@kcnvlaw.com
Attorneys for Defendants Paula Pritchard,
Kathleen Robbins, Ian Murray, Judy
Murray, Sandy Chambers, and Kerry
Dean

ORDER

IT IS SO ORDERED.



UNITED STATES DISTRICT JUDGE

DATED: August 31, 2016

Michelle Diegel

From: Adam Swick <aswick@rctlegal.com>
Sent: Tuesday, August 30, 2016 2:26 PM
To: Lesley Miller
Cc: Michelle Diegel; Ben King
Subject: RE: Stipulation regarding extending deadline to answer

Fine with me.

From: Lesley Miller [<mailto:LMiller@kcnvlaw.com>]
Sent: Tuesday, August 30, 2016 2:35 PM
To: Adam Swick <aswick@rctlegal.com>
Cc: Michelle Diegel <MDiegel@kcnvlaw.com>; Ben King <bking@rctlegal.com>
Subject: RE: Stipulation regarding extending deadline to answer

Thank you. Here it is revised. Let me know if okay to file.
Lesley

KAEMPFER

CROWELL

Lesley B. Miller
Kaempfer Crowell
1980 Festival Plaza Drive, Suite 650
Las Vegas, NV 89135-2958
Tel: (702) 792-7000
Fax: (702) 796-7181
Email: lmiller@kcnvlaw.com

| [BIO](#) | [WEBSITE](#) | [VCARD](#) |

 Please consider the environment before printing this email

This e-mail communication is a confidential attorney-client communication intended only for the person named above. If you are not the person named above, or the employee or agent responsible for delivery of the following information, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone (702) 792-7000. Also, please e-mail the sender that you have received the communication in error. We will gladly reimburse your telephone expenses. Thank you.

IRS Circular 230 Notice: To ensure compliance with requirements imposed by the IRS, we inform you that any federal tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein.

From: Adam Swick [<mailto:aswick@rctlegal.com>]
Sent: Tuesday, August 30, 2016 11:39 AM
To: Lesley Miller
Cc: Michelle Diegel; Ben King
Subject: RE: Stipulation regarding extending deadline to answer

I think one of the defendant groups asked for an extension and the Court granted it, but changed the language of the order to something like 15 days after the denial of the settlement documents. May want to conform the proposed order and relief requested to that.

From: Lesley Miller [<mailto:LMiller@kcnvlaw.com>]
Sent: Tuesday, August 30, 2016 12:08 PM
To: Adam Swick <aswick@rctlegal.com>
Cc: Michelle Diegel <MDiegel@kcnvlaw.com>
Subject: Stipulation regarding extending deadline to answer

Adam,

With your review and approval of the enclosed stipulation, we will file it with the court to extend the Pritchard Defendants' deadline to answer the amended complaint.

Thank you,
Lesley

KAEMPFER

CROWELL

Lesley B. Miller
Kaempfer Crowell
1980 Festival Plaza Drive, Suite 650
Las Vegas, NV 89135-2958
Tel: (702) 792-7000
Fax: (702) 796-7181
Email: lmiller@kcnvlaw.com

| [BIO](#) | [WEBSITE](#) | [VCARD](#) |

 Please consider the environment before printing this email

This e-mail communication is a confidential attorney-client communication intended only for the person named above. If you are not the person named above, or the employee or agent responsible for delivery of the following information, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone (702) 792-7000. Also, please e-mail the sender that you have received the communication in error. We will gladly reimburse your telephone expenses. Thank you.

IRS Circular 230 Notice: To ensure compliance with requirements imposed by the IRS, we inform you that any federal tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein.