

1 MICHELLE D. ALARIE, ESQ.
2 Nevada Bar No. 11894
3 **ARMSTRONG TEASDALE LLP**
4 3770 Howard Hughes Parkway, Suite 200
5 Las Vegas, Nevada 89169
6 Telephone: 702.678.5070
7 Facsimile: 702.878.9995
8 malarie@armstrongteasdale.com

9
10 DANIEL O'TOOLE, ESQ. (will comply with LR IA 11-2 within 45 days)
11 Missouri Bar No. 38051
12 **ARMSTRONG TEASDALE LLP**
13 7700 Forsyth Boulevard, Suite 1800
14 St. Louis, Missouri 63105
15 Telephone: 314.621.5070
16 Facsimile: 314.621.5065
17 dotoole@armstrongteasdale.com

18 *Attorneys for Defendant Keefe Commissary Network,
19 LLC*

20
21 **IN THE UNITED STATES DISTRICT COURT**

22
23 **FOR THE DISTRICT OF NEVADA**

24
25 JOHANA REYES,
26 Plaintiff,
27 vs.
28 KEEFE GROUP, LLC and DOE Defendants
I-X,
Defendants.

29 Case No.: 3:18-cv-00004-LRH-WGC
30 ;

31 **UNOPPOSED MOTION TO EXTEND
32 DEFENDANT'S DEADLINE TO RESPOND
33 TO COMPLAINT AND
34 ORDER**

35 **[FIRST REQUEST]**

36
37 Defendant Keefe Commissary Network, LLC (incorrectly identified in the Complaint as
38 Keefe Group, LLC ("Keefe"), by and through its counsel, Armstrong Teasdale LLP, hereby
39 respectfully requests an extension of Keefe's deadline to respond to the Complaint from February 7,
40 2018, to **March 5, 2018**. Plaintiff Johana Reyes ("Reyes") has consented to the requested extension.
41 This is the first request to extend this particular deadline.

42
43 On January 4, 2018, Reyes filed her Complaint against Keefe alleging claims for sexually
44 hostile work environment, disability discrimination, and retaliation. *See* ECF No. 1. The Summons

1 and Complaint were served on Keefe on January 17, 2018. *See* ECF No. 4. Therefore, pursuant to
2 Rule 12(a) of the Federal Rules of Civil Procedure, Keefe's response to the Complaint is due on
3 February 7, 2018.

4 On February 5, 2018, undersigned counsel contacted Reyes' counsel to discuss stipulating to
5 extend Keefe's response deadline. Reyes' counsel agreed to continue Keefe's answer deadline from
6 February 7, 2018, to March 5, 2018. Counsels, however, were not able to agree on language for a
7 stipulation, therefore, Keefe files this unopposed motion.

8 Good cause for this extension exists. Counsel for Keefe was recently retained, and therefore,
9 requires additional time to adequately review and consider this matter in anticipation of responding
10 to the Complaint. This short extension will not prejudice any parties nor affect any current deadlines
11 because this case is still in its infancy – no parties have answered the Complaint and a case
12 management order had not been entered. This stipulation is entered into in good faith and is not
13 intended to unduly delay the proceedings.

14 ///

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 Accordingly, Keefe requests that an order be entered extending the deadline for Keefe to
2 respond to the Complaint from February 7, 2018, to **March 5, 2018**.

3
4 Dated this 7th day of February, 2018.

ARMSTRONG TEASDALE, LLP

5
6 By: /s/ Michelle D. Alarie
MICHELLE D. ALARIE, ESQ.
7 Nevada Bar No. 11894
8 3770 Howard Hughes Parkway, Suite 200
9 Las Vegas, Nevada 89169
Telephone: 702.678.5070
Facsimile: 702.878.9995
malarie@armstrongteasdale.com

10
11 DANIEL O'TOOLE, ESQ.
Missouri Bar No. 38051
12 7700 Forsyth Boulevard, Suite 1800
St. Louis, Missouri 63105
dotoole@armstrongteasdale.com

13
14 *Attorneys for Defendant Keefe Commissary
Network, LLC*

15
16 **ORDER**

17
18 **IT IS SO ORDERED.**

19
20 
UNITED STATES MAGISTRATE JUDGE

21 DATED: February 7, 2018