ANTHONY L. HALL, ESQ. 1 Nevada Bar No. 5977 2 AHall@SHJNevada.com JONATHAN A. MCGUIRE, ESQ. Nevada Bar No. 15280 3 JMcGuire@SHJNevada.com 4 SIMONS HALL JOHNSTON PC 6490 S. McCarran Blvd., Ste. F-46 5 Reno, Nevada 89509 Telephone: (775) 785-0088 6 Attorneys for Defendant 7 Resolute Capital Partners LTD. 8 9 10 UNITED STATES DISTRICT COURT 11 **DISTRICT OF NEVADA** 12 SUSANA UPTON, 13 CASE NO.: 3:21-cv-00270-HDM-WGC Plaintiff, 14 STIPULATION AND ORDER v. 15 **EXTENDING DEADLINE FOR** DEFENDANT TO ANSWER OR **RESOLUTE CAPITAL PARTNERS LTD.,** 16 **OTHERWISE PLEAD TO PLAINTIFF'S COMPLAINT** Defendant. 17 [First Request] 18 Plaintiff Susana Upton ("Plaintiff" or "Upton") and Defendant Resolute Capital Partners 19

LTD. ("Defendant" or "RCP") (collectively, the "Parties"), by and through their respective counsel, 20 hereby submit the following Stipulation and [Proposed] Order to Extend Deadline for Defendants to 21 Respond to Plaintiff's Complaint. The Parties have agreed to a thirty (30) day extension of the 22 deadline for Defendant to answer or otherwise respond to Plaintiff's Complaint, up to and including 23 **Thursday, August 12, 2021**. The period of thirty (30) days was agreed upon by the parties in order 24 to allow time for Plaintiff's counsel to communicate with the Nevada Equal Rights Commission 25 regarding clarification/confirmation of the exhaustion of certain administrative remedies given that 26 the relevant Charge of Discrimination does not, on its face, address the sex related claims in Plaintiff's 27 Complaint. 28

| 1 | This request is made in good faith, is not made for the purpose of delay, and will not result in |
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| 2 | any undue delay or prejudice. |
| 3 4 | RESPECTFULLY SUBMITTED, |
| 5 | DATED this 15 th day of July, 2021. DATED this 15 th day of July, 2021. |
| 6 | BY: /s/ Mark Mausert, Esq. BY: /s/ Anthony L. Hall |
| 7 | MARK MAUSERT, ESQ.ANTHONY L. HALL, ESQ.Nevada Bar No. 2398Nevada Bar No. 5977 |
| 8 9 | mark@markmausertlaw.comAHall@SHJNevada.com729 Evans AvenueJONATHAN A. MCGUIRE, ESQ.Reno, Nevada 89512Nevada Bar No. 15280 |
| 9 10 | Reno, Nevada 89512 Nevada Bar No. 15280 Phone: (775) 786-5477 JMcGuire@SHJNevada.com Fax: (775) 786-9658 SIMONS HALL JOHNSTON PC |
| 11 | Attorneys for Plaintiff6490 S. McCarran Blvd., Ste. F-46Reno, Nevada 89509 |
| 12 | Telephone: (775) 785-0088 |
| 13 | Attorneys for Defendant |
| 14 | IT IS SO ORDERED. |
| 15 | With G. Cobb |
| 16 | UNITED STATES MAGISTRATE JUDGE |
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| 18 | DATED: July 16, 2021 |
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