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7 UNITED STATES DISTRICT COURT
8 EASTERN DISTRICT OF CALIFORNIA

9 VERONICA BRILL, *et al.*

10 Plaintiffs,

11 vs.

12 MICHAEL L. POSTLE, *et al.*

13 Defendants.
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Case No. 2:19-cv-02027-WBS-AC

The Honorable William B. Shubb

THIRD STIPULATION TO EXTEND TIME
TO FILE SECOND AMENDED
COMPLAINT

15 Plaintiffs Veronica Brill, et al. (“Plaintiffs”), by and through counsel; Defendant King’s
16 Casino Management Corp., successor by merger with King’s Casino, LLC d/b/a The Saloon at
17 Stones Gambling Hall (“King’s Casino”), by and through counsel; and Defendant Justin Kuraitis
18 (“Kuraitis”), by and through counsel, hereby stipulate and agree as follows:

19 First, the parties seek to extend the time for Plaintiffs to file their Second Amended
20 Complaint from August 7, 2020 to September 11, 2020.

21 Second, this is the parties’ third request for an extension of the time for Plaintiffs to file a
22 Second Amended Complaint. The Court previously extended the time for Plaintiffs to file a
23 Second Amended Complaint from June 23, 2020 to July 7, 2020 and then, subsequently, from
24 July 7, 2020 to August 7, 2020.

25 Third, a court may extend the time for a party to file an amended complaint for good
26 cause. Fed. R. Civ. Pro. 6(b). Counsel for the parties have reached an agreement as to the

THIRD STIPULATION TO EXTEND TIME TO FILE SECOND AMENDED COMPLAINT - 1

1 principal terms of a settlement of this case, but require additional time to finalize the settlement.
2 Specifically, inasmuch as there are 88 Plaintiffs in this case, some additional time is needed to
3 communicate with each about final settlement terms and the relative benefits and detriments of
4 accepting such a settlement. While counsel for the Plaintiffs has regularly updated his clients and
5 communicated with his clients throughout discussions, the Plaintiffs herein do not form a class
6 and do not act as a bloc, so it is expected some time will be needed to ensure every Plaintiff is
7 meaningfully counseled – and has his/her respective questions substantively addressed on an
8 individualized basis – before a final settlement can be executed.

9 Accordingly, the parties stipulate and agree that Plaintiffs’ time to file their Second
10 Amended Complaint shall be extended from August 7, 2020 to September 11, 2020.

11 SO STIPULATED.

12
13 Dated: August 5, 2020

BOIES SCHILLER FLEXNER LLP

By: /s/ Mark C. Mao (permission granted 8/5/20)

Mark C. Mao

Boies Schiller Flexner LLP

Attorneys for Defendant King’s Casino

Management Corp.

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16
17 Dated: August 5, 2020

THE VERSTANDIG LAW FIRM, LLC

By: /s/ Maurice B. VerStandig

Maurice B. VerStandig (pro hac vice)

The VerStandig Law Firm, LLC

Attorneys for Plaintiffs

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19
20 Dated: August 5, 2020

LAW OFFICES OF RICHARD PACHTER

By: /s/ Richard Pachter (permission granted 8/5/20)

Richard Pachter

Law Offices of Richard Pachter

Attorneys for Defendant Kuraitis

[PROPOSED] ORDER

The Court, having considered the Stipulation to Extend Time to File the Second Amended Complaint, and finding good cause therefore, hereby orders:

The time for Plaintiffs to file the Second Amended Complaint shall be extended from August 7, 2020 to September 11, 2020.

Dated: _____

William B. Shubb
United States District Judge