



Nelson v. Wood Residential, LLC et al

2024 | Cited 0 times | D. Nevada | March 11, 2024

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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA VANESSA NELSON

Plaintiff, vs. WOOD RESIDENTIAL, LLC; WOOD PARTNERS, LLC; WOOD REAL ESTATE INVESTORS, LLC; and DOES 1-50, inclusive,

Defendant s .

Case No. 2:24-cv-00419-ART-BNW

STIPULATION TO EXTEND THE DEADLINE TO RESPOND TO PLAINTIFF'S AMENDED COMPLAINT

IT IS HEREBY STIPULATED by and between the parties, through their respective counsel, that Wood Residential, LLC ("Wood Residential"), Wood Real Estate Investors, LLC ("WREI"), and Wood Partners, LLC ("Wood Partners")(collectively "Defendants"), shall have an additional two (2) weeks, up to and including Friday, March 22, 2024, in which to respond to Plaintiff Vanessa Nelson's ("Plaintiff") Amended Complaint. This stipulation is submitted and based upon the following: ///

1. On December 28, 2023, Plaintiff filed a Complaint against Defendants in the Eighth Judicial District Court, Clark County, Nevada asserting seven claims under Nevada state law.
2. After Defendants filed motions to dismiss, Plaintiff filed an Amended Complaint against Defendants on February 17, 2024.
3. The Amended Complaint included twelve causes of action and asserted, for the first time, collective claims under the Fair Labor Standards Act and class action wage related claims under



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Nevada Revised Statutes Chapter 608.

4. Defendants removed this action to federal court on March 1, 2024, prior to responding to the Amended Complaint.

5. Pursuant to Federal Rule of Civil Procedure 81(c)(2), Defendants currently have until March 8, 2024 (seven days after the filing of the notice of removal) to respond to the Amended Complaint.

6. However, Defendants' Counsel, Hilary Williams, has been ill, and given the five additional claims and new collective and class action allegations, Defendants need additional time to respond.

7. The parties agree that Defendants shall have an additional two weeks, up to and including Friday, March 22, 2024, to respond to the Plaintiff's Amended Complaint.

8. The parties have also entered into a separate agreement to toll the statute of limitations on Plaintiff's claims, including the putative class and collective claims, during the two- week extension from March 8 through March 22, 2024. //////////////////////////////////////

9. This request is made in good faith and not for the purpose of delay. Dated this 8th day of March, 2024. RAFII & ASSOCIATES, P.C. /s/Jason Kuller Jason Kuller, Esq., Bar No. 1224 Shay Degenan, Esq., Bar No. 16397 1120 N. Town Center Drive, Suite 130 Las Vegas, Nevada 89144 Attorneys for Plaintiff

JACKSON LEWIS P.C. /s/_Deverie J. Christensen Deverie J. Christensen, Esq., Bar No. 6596 Kirsten A. Milton, Esq., Bar No. 14401 Hilary A. Williams, Esq., Bar No. 14645 300 S. Fourth Street, Suite 900 Las Vegas, Nevada 89101 Attorneys for Defendants

ORDER IT IS HEREBY ORDERED that the deadline for Defendants Wood Residential, LLC, Wood Partners, LLC and Wood Real Estate Investors, LLC to respond to Plaintiff's Amended Complaint is extended to Friday, March 22, 2024.

Dated this _____ day of March, 2024.

United States District Court/Magistrate Judge 4869-8000-0172, v. 2

