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 8 The Pub, LLC, Joe, Dan, Decatur Restaurant & Tavern, DDRT, LLC,
 Starmaker Karaoke, Debbie Harm, Café Moda;
 9 Café Moda, LLC and William Carney

10 **UNITED STATES DISTRICT COURT**
 11 **DISTRICT OF NEVADA**

12 SLEP-TONE ENTERTAINMENT
 13 CORPORATION,

Case No.: 2:12-cv-00239-KJD-RJJ

14 Plaintiff,

15 vs.

16
 17 ELLIS ISLAND CASINO & BREWERY;
 18 FAME OPERATING COMPANY, INC.; HOT
 SHOTS BAR AND GRILL (a/k/a KELLEY'S
 19 PUB); THE PUB, LLC; JOE; DAN; BIG
 NAILS, LLC; BEAUTY BAR; CAFÉ MODA;
 20 CAFÉ MODA, LLC; WILLIAM CARNEY;
 LAS VEGAS DJ SERVICE; JONNY VALENTI;
 21 E STRING HRILL & POKER BAR; PCA
 TRAUTH, LLC; KARAOKE LAS VEGAS;
 22 JACK GREENBACK; BILL'S GAMBLIN'
 HALL & SALOON; CORNER INVESTMENT
 23 COMPANY, LLC; IMPERIAL PALACE
 HOTEL & CASINO; HARRASH'S IMPERIAL
 24 PALACE CORPORATION; ROLL 'N'
 MOBILE DJ'S AND KARAOKE TOO;
 25 KENNY ANGEL; PT'S PLACE; GOLDEN-
 PT'S PUB CHEYENNE-NELLIS 5, LLC; PT'S
 26 PUB; GOLDEN-PT'S PUB WEST SAHARA 8,
 LLC; PT'S GOLD; GOLDEN-PT'S PUB
 27 CENTENNIAL 32, LLC; GOLDEN PT'S PUB
 STEWART-NELLIS 2, LLC; FOLDEN
 28 TAVERN GROUP, LLC; STEVE & RAY

**PROPOSED DISCOVERY
 PLAN/SCHEDULING ORDER**

***SPECIAL SCHEDULING
 REVIEW REQUESTED***

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1 KARAOKE; STEVE; RAY; LEGENDS
 2 CASINO; PUGDAWIGS, LLC; STARMAKER
 3 KARAOKE DEBBIE HARMS; DECATUR
 4 RESTAURANT & TAVERN; DDRT, LLC;
 5 PUTTERS; LISA/CARRISON LTR; DJ TARA
 6 KING PRODUCTIONS; TARA KING; KIXX
 7 BAR; BOULDER STATION CASINO; NP
 8 BOULDER, LLC; NPPALACE, LLC; PALACE
 9 STATION; DANSING KARAOKE; KIRK;
 10 GILLEY’S LAS VEGAS; TREASURE
 11 ISLAND; TREASURE ISLAND, LLC; HALF
 12 SHELL SEAFOOD AND GAMIN; HALF
 13 SHELL, LLC; JAMES BELLAMY; MEGA-
 14 MUSIC PRODUCTIONS; MR. D’S SPORTS
 15 BAR; SPORTS BAR, LLC; RICK
 16 DOMINGUEZ; SOUND SELECT; ISLAND
 17 GRILL; OFFICE 7 LOUNGE &
 18 RESTAURANT, INC.; JAKE’S BAR; DOC, G.
 19 & G., INC.; MIKE CORRAL; DAVE CORRAL;
 20 SHOWTYME KARAOKE & DJ; CALICO
 21 JACK’S SALOON; MIKE R. GORDON; RED
 22 LABEL LOUNGE; RED LABEL BAR, INC.;
 23 TERRY CICCI; TERRY-OKE KARAOKE;
 24 KJ’S BAR & GRILL; L.T. BOND, INC.; TIM
 25 MILLER; VISION & SOUND
 26 ENTERTAINMENT; THUNDERBIRD
 27 LOUNGE AND BAR; ARUBA HOTEL AND
 28 SPA; IRVINGTON PROPERTIES, LLC;
 THUNDERBIRD BAR & LOUNGE, LLC;
 AUDIO THERAPY DJ; MATTE McNULTY
 (a/k/a DJ Matte); AUDIO THERAPY; GSTI
 HOLDING, LLC; GOLD SPIKE HOTEL &
 CASINO; GOLD SPIKE HOLDINGS, LLC;
 MARDI GRAS LOUNGE-BEST WESTERN;
 THE NEVADIAN, LLC; BEST WESTERN
 MARDI GRAS INN; J.P.P.J. OF NEVADA,
 INC.; HARRAH’S LAS VEGAS; CAESAR’S
 ENTERTAINMENT CORPORATION; TJ’S
 ALL-STARK KARAOKE; JOHN MENNITI;
 and JOHN DOES NOS. 1-10 INCLUSIVE,
 IDENTITIES UNKNOWN,

Defendants.

PROPOSED DISCOVERY PLAN/SCHEDULING ORDER

Pursuant to Local Rule 26-1, the parties submit the following Discovery Plan and Scheduling Order.

I. INFORMATION PURSUANT TO FRCP 26(F).

1. The first Defendants filed a Motion to Dismiss on March 16, 2012 [#13].

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1 2. Pursuant to FRCP 26(f) the counsel for the plaintiff shall initiate the scheduling of
2 a meeting within thirty (30) days after the first defendant answers or otherwise appears. To date,
3 no meeting has been held or scheduled by the Plaintiff. Nevertheless, the instant parties are
4 submitting the instant proposed discovery plan/scheduling order pursuant to the order of this
5 Court.

6 3. The parties have not exchanged their initial disclosure statements.

7 4. Discovery may be conducted on all matters relevant to issues raised by
8 subsequent pleadings and all matters otherwise within the scope of Rule 26(b)(1) and not
9 protected from disclosure.

10 5. No changes in limitations set by either the Federal Rules of Civil Procedure or
11 Local Rules of Practice for the District of Nevada are requested at this time.

12 6. No orders are requested to be entered pursuant to FRCP 16(b), 16(c) or 26(c) at
13 this time.

14 7. **Special Scheduling Review Requested:** Defendants Hot Shots Bar and Grill,
15 The Pub, LLC, Joe, Dan, Decatur Restaurant & Tavern, DDRT, LLC, Starmaker Karaoke,
16 Debbie Harm (“Hot Shot Defendants”) filed their Motion to Dismiss to Plaintiff’s Complaint on
17 April 12, 2010. [#46]. Defendants Café Moda; Café Moda, LLC and William Carney (“Café
18 Moda Defendants”) filed there joinder thereto on April 26, 2012. [#54]. Plaintiff’s filed an
19 untimely opposition on to #46 on May 10, 2012. [#65]. Because of a multiple pending motions
20 to dismiss, some Defendants (including the Café Moda Defendants) have yet to file an answer.
21 As such, the instant parties respectfully request that this Court forgive their failure to file a
22 Proposed Discovery Plan and Scheduling Order and allow discovery to close beyond the 180
23 days required by Local Rule 26-1(e)(1) as outlined below.

24 **II. INFORMATION PURSUANT TO LOCAL RULE 26-1(E).**

25 **1. Discovery Cutoff Date:**

26 The last day of discovery shall be one year from the date of filing of the Complaint or on
27 or before February 18, 2013.

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2. Amending the Pleadings and Adding Parties:

In accordance with Local Rule 26-1(e)(2), the last day to file a motion to amend the pleadings or to add parties shall be November 16, 2012.

3. Experts:

In accordance with Local Rule 26-1(e)(3), the last day for disclosures as required by FRCP 26(a)(2)(c) concerning experts shall be December 18, 2012. The last day for disclosures concerning rebuttal experts shall be January 18, 2012.

4. Dispositive Motions:

In accordance with Local Rule 26-1(e)(4), the last day for filing dispositive motions including, but not limited to motions for summary judgment, shall be March 18, 2013.

5. Pretrial Order:

In accordance with Local Rule 26-1(e)(5), the last day to file a Joint Pretrial Order, including any disclosures pursuant to FRCP 26(a)(3), shall be April 18, 2012. In the event dispositive motions are filed, the date for filing the Joint Pretrial Conference shall be suspended until thirty (30) days after decision on the dispositive motion or upon further Order by the Court extending the time period in which to file the Joint Pretrial Order.

III. EXTENSION OF SCHEDULED DEADLINES.

In accordance with Local Rule 26-4, a request for an extension of this discovery plan shall be filed and served no later than twenty (20) days before the discovery cut off date.

DATED this 13th day of June, 2012.

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By: /s/ Brian R. Hardy
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IT IS SO ORDERED this ____ day of _____, 2012.

UNITED STATES DISTRICT COURT JUDGE