SNELL & WILMER L.L.P.
Howard M. Privette, Bar No. 137216
hprivette@swlaw.com
600 Anton Blvd., Suite 1400
Costa Mesa, California 92626-7689
Telephone: 714.427.7000
Facsimile: 714.427.7799

IFRAH LAW P.L.L.C.
A. Jeff Ifrah (*pro hac vice* forthcoming)
jeff@ifrahlaw.com
Abbey Block (*pro hac vice* forthcoming)
ablock@ifrahlaw.com
1717 Pennsylvania Ave., N.W.
Suite 650
Washington, D.C. 20006
Telephone: 202.524.4140
Facsimile: 202.524.4141

Attorneys for Specially Appearing Defendant
MW Services Ltd., d/b/a/ Wow Vegas

SNELL & WILMER L.L.P. LAW OFFICES 600 ANTON BLVD, SUITE 1400 COSTA MESA, CALIFORNIA 92626-7689

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

JENNIFER BOUCHER, individually and on behalf of all others similarly situated,

Plaintiff,

v.

MW SERVICES, LTD., d/b/a/ WOW VEGAS,

Defendant.

Case No. 2:25-CV-02793-DJC-AC

Hon. Daniel J. Calabretta

JOINT STIPULATION TO SET SCHEDULE FOR BRIEFING AND HEARING INITIAL MOTIONS AND TO STAY SCHEDULING CONFERENCE AND RULE 26 MATTERS

-and-

ORDER THERON

State complaint filed: June 17, 2025
Service date: September 8, 2025
Removal date: September 26, 2025
Current date for response to complaint: October 31, 2025

AUTHENTICATED U.S. GOVERNMENT INFORMATION GPO

Plaintiff Jennifer Boucher ("Plaintiff") and defendant MW Services, Ltd., d/b/a Wow Vegas ("Defendant") (collectively the "Parties"), through their attorneys, stipulate and agree as follows:

RECITALS

1. Defendant timely and properly removed this action to federal court on September 26, 2025, on the basis of CAFA and diversity of citizenship;

2. Defendant has not yet responded to Plaintiff's complaint in this case;

3. Pursuant to Local Rule 144(a), the Parties previously stipulated and agreed that Defendant's time to answer, move, or otherwise respond to the complaint in this case was extended through and until October 31, 2025 (ECF 7);

3. Defendant intends to move to compel arbitration in this case;

4. Plaintiff also seeks to amend its complaint to include additional allegations and streamline many of the legal issues in this case;

5. The Parties have met and conferred and, subject to the approval of the Court, agreed upon an initial schedule for this case to address the orderly sequencing and resolution of the amended complaint, the proposed motion to compel arbitration, any motion to dismiss, and Rule 26 matters;

6. By entering into this stipulation, Defendant is not agreeing to this Court's jurisdiction over Defendant and is not waiving any defenses including arguments that this Court lacks jurisdiction over Defendant;

STIPULATION

WHEREFORE, subject to the approval of the Court, the Parties stipulate and agree as follows:

1. Plaintiff shall file her amended complaint on or before October 31, 2025;

2. Defendant shall file and serve its motion to compel arbitration on or before November 21, 2025;

/ / /

SNELL & WILMER L.L.P. LAW OFFICES 600 ANTON BLVD, SUITE 1400 COSTA MESA, CALIFORNIA 92626-7689

3. Plaintiff shall file and serve her papers in opposition to the motion to compel arbitration on or before December 15, 2025, Defendant shall file its reply papers on or before December 30, 2025, and the hearing on said motion shall be set for January 22, 2026, or as soon thereafter as is established by the Court;

4. Defendant's time to answer, move, or otherwise respond to the amended complaint pursuant to Rule 12 is further extended until thirty days after resolution of Defendant's motion to compel arbitration, such that, if the motion is denied in whole or in part, and an appeal is taken, the time to respond shall be through and until the 30th day following issuance of the mandate of the Ninth Circuit upon its affirmance of the denial of Defendant's motion to compel arbitration;

5. Prior to filing a Rule 12 motion to dismiss, if any, the Parties shall meet and confer concerning a mutually agreeable briefing and hearing schedule for such motion;

6. All Rule 26 requirements and the conduct of a Scheduling Conference with the Court will be held in abeyance pending the filing and resolution of the motion to compel arbitration and any subsequent Rule 12 response by Defendant to the amended complaint.

IT IS SO STIPULATED.

Dated: October 15, 2025

SNELL & WILMER L.L.P.

By: */s/ Howard M. Privette*
Howard M. Privette

IFRAH LAW P.L.L.C.
A. Jeff Ifrah
Abbey Block

Attorneys for Specially Appearing Defendant MW Services, Ltd. d/b/a/ Wow Vegas

SNELL & WILMER L.L.P.
LAW OFFICES
600 ANTON BLVD, SUITE 1400
COSTA MESA, CALIFORNIA 92626-7689

Dated: October 15, 2025

EDELSBERG LAW, P.A.

By: */s/ Scott Edelsberg*
(as authorized on October 15, 2025)
Scott Edelsberg
Gabriel Mandler

Attorneys for Plaintiff Jennifer Boucher

ORDER ON STIPULATION

IT IS SO ORDERED.

Dated: October 17, 2025

/s/ Daniel J. Calabretta
THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE

SNELL & WILMER L.L.P.
LAW OFFICES
600 ANTON BLVD, SUITE 1400
COSTA MESA, CALIFORNIA 92626-7689