

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA

**Julie Galvez, on behalf of herself and all others similarly situated v.
Hilton Resorts Corporation**

Galvez · No. 2:24-cv-02147-CDS-BNW · Decided December 10, 2025

OPINION

1 || Montgomery Y. Paek, Esq. Nevada Bar No. 10176 2 Amy L. Thompson, Esq. 3 || Nevada Bar
No. 11907 Andrew S. Clark, Esq. 4 || Nevada Bar No. 14854 LITTLER MENDELSON, P.C. 5 ||
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UNITED STATES DISTRICT COURT 2 DISTRICT OF NEVADA JULIE GALVEZ, on behalf of
herself and all Case No. 2:24-cv-02147-CDS-BNW 13 others similarly situated, Plaintiff
STIPULATION AND ORDER TO 14 m STAY PROCEEDINGS 15 |v. J]FOURTH REQUEST]
16 || HILTON RESORTS CORPORATION, [ECF No. 21] 17 Defendant 18 19 20 Plaintiff Julie
Galvez and Defendant Hilton Resorts Corporation hereby stipulate and agree 21 |! to stay all
proceedings in this matter for 62 days, up to and including February 10, 2026, to allow 22 || the
parties to participate in a private mediation in this matter.

Since the parties' last request to stay 23 || proceedings, they have agreed to continue the mediation
in this matter to February 10, 2026, to 24 |! allow additional time to exchange extensive pay and
time records for the putative class and 25 || collective before mediation.

The requested stay would include all current deadlines, including the 26 || current deadline for
Defendant to file a response to Plaintiffs First Amended Complaint (ECF No. 27 || 8) and the
deadline for the Parties to file a Joint Discovery Plan and Scheduling Order. 28 MENDELSON,
P.C 1 The purpose of this stipulation is to promote judicial economy and permit this Court to 2
effectively control the disposition of cases on its docket with economy of time and effort for itself,
3 counsel, and the litigants.

See *Landis v. N. Am. Co.*, 299 U.S. 248, 254 (1936) (“[T]he power to 4 stay proceedings is
incidental to the power inherent in every court to control the dispositions of the 5 causes on its
docket with economy of time and effort for itself, for counsel, and for litigants.”); 6 *Pate v. DePay*
Orthopedics, Inc., No. 2:12-cv-01168-MMD-CWH, 2012 WL 3532780, *2 (D.

Nev. 7 Aug. 14, 2012) (“A trial court may, with propriety, find it is efficient for its own docket and
the 8 fairest course for the parties to enter a stay of an action before it, pending resolution of
independent 9 proceedings which bear upon the case.”) (internal citations omitted).

In evaluating whether to stay 10 proceedings, the Court considers the competing interests of the parties and of the Court, including 11 ““possible damage which may result in granting the stay, the hardship or inequity which a party 12 may suffer in being required to go forward, and the orderly course of justice measured in terms of 13 simplifying or complicating of issues, proof, and questions of law which could expected to result 14 from a stay.”” Coker v. Dowd, No. 2:13-cv-0994-JCM-NJK, 2013 WL 12216682, *1 (D.

Nev. Jul. 15 8, 2013) (granting joint motion to stay all proceedings pending mediation), quoting Lockyer v. 16 Mirant Corp., 398 F.3d 1098, 1110 (9th Cir. 2005). 17 The Parties initially scheduled a private mediation in this matter for December 10, 2025, 18 but, due to unforeseen issues, Defendant requested to continue the mediation.

After consulting 19 with Plaintiff and the private mediator, the parties agreed to reschedule the mediation on February 20 10, 2026, and are therefore actively exploring alternative dispute resolution to potentially resolve 21 this litigation entirely.

As this is a putative class action, such exploration is more complex and time 22 consuming. The Parties believe that, through their efforts, they may be able to resolve the matter 23 and avoid unnecessary litigation costs and the unnecessary use of judicial resources. 24 Based on the foregoing, the Parties agree that their interests are aligned in seeking to 25 potentially resolve this matter entirely without expending unnecessary litigation costs and efforts, 26 and that neither Plaintiff nor Defendant will be prejudiced by a stay of the proceedings.

The Parties 27 also agree that they will each suffer an avoidable hardship – time and money spent litigating – if 28 the matter is required to proceed at this stage considering the Parties’ agreement to explore a 1 || potential resolution. Lastly, the Parties respectfully submit that staying all proceedings will avoid 2 || expending judicial resources in the event that they simplify or entirely dispose of the issues in this 3 || action.

Accordingly, the Parties agree and stipulate that good cause exists to stay all proceedings 4 || as requested herein. 5 The Parties will file a joint status report informing the Court of the outcome of their efforts 6 || to resolve Plaintiffs claims within fourteen (14) days of the expiration of this stay: 7 1. Should the Parties reach a settlement of all claims, the Parties will update the Court 8 || as to the tentative resolution and set forth a proposed briefing schedule for settlement approval; or 9 2.

Should the Parties be unsuccessful at resolving all claims, the Parties shall inform 10 || the Court which, if any, claims were not resolved and propose a scheduling order for the matter to 11 || proceed, including for Defendant’s response to the Plaintiff’s First Amended Complaint, issuance 12 || of a putative class list, and notification to the putative collective.

13 This stipulation is submitted in good faith to allow the parties to potentially resolve the 14 || matter entirely and 1s not for the purpose of causing any undue delay. This is the fourth request to

15] stay this case. 16 Dated: December 10, 2025 Dated: December 10, 2025 8 Respectfully submitted, Respectfully submitted, 19 /s/ Leah L. Jones /s/ Andrew S. Clark 20 || Joshua D. Buck, Esq.

Montgomery Y. Paek, Esq. Leah L. Jones, Esq. Amy L. Thompson, Esq. 21 || THIERMAN BUCK Andrew S. Clark, Esq. Attorneys for Plaintiff LITTLER MENDELSON, P.C. 22 || JULIE GALVEZ Attorney for Defendant 53 HILTON RESORTS CORPORATION ITISSOO RED. 25 26 7 D STATES DISTRICT JUDGE 28 ted: _December 10, 2025