

1 T. Barton French, Jr., Nevada Bar No. 005641
 Jackalyn A. Olinger Rochelle, Illinois Bar No. 6288480
 2 Admitted *Pro Hac Vice*
 Lorrette Fisher, New York Bar No. 5263934
 3 Admitted *Pro Hac Vice*
 Benjamin W. Haile, Oregon Bar No. 040660
 4 Admitted *Pro Hac Vice*
 MAUNE RAICHLÉ HARTLEY FRENCH & MUDD, LLC
 5 1015 Locust Street, Suite 1200
 St. Louis, MO 63101
 6 jrochelle@mrhfmlw.com
lfisher@mrhfmlaw.com
 7 bhaile@mrhfmlaw.com
 Phone: (800) 358-5922
 8 Fax: (314) 241-4838
 Attorneys for Plaintiff

9 Lawrence E. Mittin, Nevada Bar No. 005428
 10 CRAIG P. KENNY & ASSOCIATES
 501 S. 8th Street
 11 Las Vegas, NV 89101
 (702) 380-2800
 12 Fax: (702) 380-2833
lmittin@cpklaw.com
 13 Attorneys for Plaintiff

14 **UNITED STATES DISTRICT COURT**
FOR THE DISTRICT OF NEVADA

15
 16 JORDAN J. POTTER,

17 Plaintiff,

18 v.

19 CRANE CO., et al.,

20 Defendants.

CASE NO.: 2:20-CV-00276-RFB-VCF

**JOINT MOTION FOR EXTENSION
 OF TIME FOR PLAINTIFF TO
 REPLY IN SUPPORT OF
 PLAINTIFF'S MOTION FOR
 PROTECTIVE ORDER
 (First Request)**

21
 22 Pursuant to Fed. R. Civ. P. 6(b) and Nevada Local Rule IA 6-1, Plaintiff Jordan J. Potter
 23 and Defendant General Dynamics Corporation, by counsel, consent to an order by the Court that
 24 Plaintiff's time to file a Reply in Support of Plaintiff's Motion for Protective Order be extended

1 by one week from to current due date of December 2, 2020 to **December 9, 2020**.

2 As grounds for this Stipulation, Plaintiff Jordan J. Potter, by counsel, states he is in the
3 process of preparing the appropriate Reply brief and requires additional time to fully reply to
4 matters raised in Defendant's Response. No prejudice will result from the extension. This is the
5 first request for an extension. NV LR IA 6-1(a).

6 DATED this 2nd day of December, 2020

7
8 MAUNE RAICHLE HARTLEY FRENCH &
MUDD, LLC

9 By: /s/ Benjamin W. Haile
10 T. Barton French, Jr., Nevada Bar No. 5641
Jackalyn A. Olinger Rochelle,
11 Illinois Bar No. 6288480
Admitted *Pro Hac Vice*
Lorrette Fisher, New York Bar No. 5263934
12 Admitted *Pro Hac Vice*
Benjamin W. Haile, Oregon Bar No. 040660
13 Admitted *Pro Hac Vice*
1015 Locust Street, Suite 1200
St. Louis, MO 63101
14 Phone: (800) 358-5922
Fax: (314) 241-4838
jrachelle@mrhfmlaw.com
15 lfisher@mrhfmlaw.com
bhaile@mrhfmlaw.com
16 *Attorneys for Plaintiff*

17
18 CRAIG P. KENNY & ASSOCIATES
Lawrence E. Mittin, Esq., Nevada Bar No. 5428
501 S. 8th Street
19 Las Vegas, NV 89101
(702) 380-2800
20 Fax: (702) 380-2833
lmittin@cpklaw.com
21 *Attorneys for Plaintiff*

GORDON REES SCULLY MANSUKHANI, LLP

/s/ Erik C. DiMarco
ERIK C. DiMARCO, ESQ.
New York Bar No. 2872976, Pro Hac Vice
1 Battery Park Plaza, 28th Floor
New York, New York 10004
Attorneys for Defendant,
GENERAL DYNAMICS CORPORATION

IT IS SO ORDERED

United States Magistrate Judge

DATED: 12-9-2020

CERTIFICATE OF SERVICE

I certify that I am an employee of MAUNE RAICHLE HARTLEY FRENCH & MUDD, LLC and that on the 2nd day of December, 2020, I served a true and correct copy of the foregoing **JOINT MOTION FOR EXTENSION OF TIME FOR PLAINTIFF TO REPLY IN SUPPORT OF PLAINTIFF’S MOTION FOR PROTECTIVE ORDER** to all parties on file with the CM/ECF:

PLAINTIFF JORDAN POTTER
CRAIG P. KENNY & ASSOCIATES
Lawrence E. Mittin, Esq.
501 S. 8th Street
Las Vegas, NV 89101
Telephone: (702) 380-2800
Facsimile: (702) 380-2833

lmittin@cpklaw.com
shanks@cpklaw.com

ARROWHEAD PRODUCTS

HOLLAND & HART LLP

Lars K. Evensen
Joseph G. Went
9555 Hillwood Drive, 2nd Floor
Las Vegas, Nevada 89134
Phone: 702.669.4600
Fax: 702.669.4650

BENESCH, FRIEDLANDER, COPLAN & ARONOFF LLP

Eric Larson Zalud (*pro hac vice forthcoming*)
200 Public Square, Suite 2300
Cleveland, Ohio 44114-2378
Telephone: 216.363-4500
Facsimile: 216.363-4588

BENESCH, FRIEDLANDER, COPLAN & ARONOFF LLP

Joseph R. Blalock (*pro hac vice forthcoming*)
4100 South High Street, Suite 2600
Columbus, Ohio 43215-6164
Telephone: 614.223-9300
Facsimile: 614.223-9330

lkevensen@hollandhart.com
jgwent@hollandhart.com
ezalud@beneschlaw.com
jblalock@beneschlaw.com

CRANE CO.

BACKUS, CARRANZA & BURDEN

Edgar Carranza, Esq.
Jacquelyn Franco, Esq.
3050 South Durango Drive
Las Vegas, Nevada 89117
(702) 872-5555 tel.
(702) 872-5545 fax

ecarranza@backuslaw.com
JacquelynFranco@backuslaw.com

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

DCO LLC
LEWIS BRISBOIS BRISGAARD & SMITH, LLP
Ronald L. Hellbusch
1700 Lincoln Street, Suite 4000
Denver, CO 80203
(303) 861-7760

LEWIS BRISBOIS BRISGAARD & SMITH, LLP
Steven Abbott
Michael R. Smith
6385 S. Rainbow Boulevard, Suite 600
Las Vegas, Nevada 89118
(702) 893-3383 tel.
(702) 893-3789 fax

Ronald.Hellbusch@lewisbrisbois.com
Michael.R.Smith@lewisbrisbois.com
Steven.Abbott@lewisbrisbois.com

DEXTER HYSOL AEROSPACE, LLC
LEWIS BRISBOIS BISGAARD & SMITH LLP
Darrell D. Dennis, Esq.
Steven B. Abbott, Esq.
Michael R. Smith, Esq.
6385 South Rainbow Blvd., Suite 600
Las Vegas, Nevada 89118
Telephone: (702) 893-3383
Facsimile: (702) 893-3789

Darrell.Dennis@lewisbrisbois.com
Steven.Abbott@lewisbrisbois.com
Michael.r.Smith@lewisbrisbois.com

EATON AEROQUIP, LLC

Michael M. Edwards
Ryan Loosvelt
MESSNER REEVES LLP
8945 West Russell Road, Suite 300
Las Vegas, Nevada 89148
702 363 5100 tel
702 363 5101 fax

David P. Strup
Shumaker, Loop & Kendrick, LLP
1000 Jackson Street
Toledo, OH 43604
(419) 321-1306

medwards@messner.com
rloosvelt@messner.com
dstrup@shumaker.com

GENERAL DYNAMICS CORPORATION

GORDON REES SCULLY MANSUKHANI, LLP

Robert E. Schumacher
James E. Cavanaugh
Michael Ramirez
James Lowery
300 South Fourth Street, Suite 1550
Las Vegas, Nevada 89101
Direct Lines: (702) 577-9319/9340
Telephone: (702) 577-9300
Facsimile: (702) 255-2858

Erik DiMarco, Esq.
Aleksandra Szaina, Esq.
1 Battery Park Plaza, 28th Floor
New York, NY 10004
(212) 269-5500

edimarco@grsm.com
aszajna@grsm.com
rschumacher@grsm.com
jecavanaugh@grsm.com
mramirez@grsm.com
jlowery@grsm.com

1 **GENERAL ELECTRIC COMPANY**

2 J Christopher Jorgensen
3 Nevada Bar No. 5382
4 LEWIS ROCA ROTHGERBER CHRISTIE LLP
5 3993 Howard Hughes Pkwy, Suite 600
6 Las Vegas, NV 89169-5996
7 Tel: (702) 949-820
8
9 cjorgensen@lrrc.com

6 **GOODRICH CORPORATION**

7 EVANS FEARS & SCHUTTERT LLP
8 Jay J. Schutttert
9 Alexandria L. Layton
10 2300 West Sahara Avenue, Suite 950
11 Las Vegas, Nevada 89102
12 Telephone: 702-805-0290
13 Facsimile: 702-805-0291

10 **VORYS, SATER, SEYMOUR AND PEASE LLP**

11 Stephen C. Musilli
12 52 E. Gay Street
13 Columbus, OH 43215
14 (614) 464-6494
15
16 jschutttert@efstriallaw.com
17 alayton@efstriallaw.com
18 scmusilli@vorys.com

15 **HARCOSEMCO LLC**

16 **OLSON CANNON GORMLEY & STOBERSKI**
17 Michael E. Stoberski
18 Paterno C. Jurani
19 9950 West Cheyenne Avenue
20 Las Vegas, NV 89129
21 Telephone: (702) 384-4012
22 Facsimile: (702) 383-0701
23
24 mstoberski@ocgas.com
pjurani@ocgas.com

HENKEL US OPERATIONS CORPORATION, incorrectly named as Henkel Corporation as successor-in-interest to Locite Corporation

LEWIS BRISBOIS BISGAARD & SMITH LLP

Darrell D. Dennis, Esq.
Steven B. Abbott, Esq.
Michael R. Smith, Esq.
6385 South Rainbow Blvd., Suite 600
Las Vegas, Nevada 89118
Telephone: (702) 893-3383
Facsimile: (702) 893-3789

Darrell.Dennis@lewisbrisbois.com
Steven.Abbott@lewisbrisbois.com
Michael.r.Smith@lewisbrisbois.com

HEXCEL CORPORATION

Michelle D. Alarie
ARMSTRONG TEASDALE LLP
3770 Howard Hughes Parkway, Suite 200
Las Vegas, Nevada 89169
Telephone: (702) 678-5070
Facsimile: (702) 878-8995

Gregory Iken
ARMSTRONG TEASDALE LLP
7700 Forsyth Blvd., Suite 1800
St. Louis, MO 63105
Telephone: (314) 621-5070
Facsimile: (314) 621-5065

Scott Kossoudji
Glazier Ycc LLP
707 Wilshire Boulevard, Suite 2025
Los Angeles, CA 90017
Telephone: (213) 312-9200

malarie@atllp.com
giken@atllp.com
kossoudji@glazieryee.com

1 **INDUSTRIAL MANUFACTURING**

2 **HOLLAND & HART LLP**

3 Lars K. Evensen

4 Joseph G. Went

5 9555 Hillwood Drive, 2nd Floor

6 Las Vegas, Nevada 89134

7 Phone: 702.669.4600

8 Fax: 702.669.4650

9 **BENESCH, FRIEDLANDER, COPLAN & ARONOFF LLP**

10 Eric Larson Zalud (*pro hac vice forthcoming*)

11 200 Public Square, Suite 2300

12 Cleveland, Ohio 44114-2378

13 Telephone: 216.363-4500

14 Facsimile: 216.363-4588

15 **BENESCH, FRIEDLANDER, COPLAN & ARONOFF LLP**

16 Joseph R. Blalock (*pro hac vice forthcoming*)

17 4100 South High Street, Suite 2600

18 Columbus, Ohio 43215-6164

19 Telephone: 614.223-9300

20 Facsimile: 614.223-9330

21 lkevensen@hollandhart.com

22 jgwent@hollandhart.com

23 ezalud@beneschlaw.com

24 jblalock@beneschlaw.com

1 **NORTHROP GRUMMAN SYSTEMS CORPORATION**

2 EVANS FEARS & SCHUTTER LLP

3 Jay J. Schuttert
4 Alexandria L. Layton
5 2300 West Sahara Avenue, Suite 950
6 Las Vegas, NV 89102
7 (702) 805-0216

8 TUCKER ELLIS LLP

9 Daniel J. Kelly
10 201 Mission Street, Suite 2310
11 San Francisco, CA 94105
12 (415) 617-2203 tel.
13 (415) 617-2409 fax

14 jschuttert@efstriallaw.com
15 alayton@efstriallaw.com
16 daniel.kelly@tuckerellis.com

17 **OLD ORCHARD INDUSTRIAL CORP**

18 GORDON REES SCULLY MANSUKHANI, LLP

19 Robert E. Schumacher
20 James E. Cavanaugh
21 Michael Ramirez
22 James Lowery
23 300 South Fourth Street, Suite 1550
24 Las Vegas, Nevada 89101
Direct Lines: (702) 577-9319/9340
Telephone: (702) 577-9300
Facsimile: (702) 255-2858

Erik DiMarco
1 Battery Park Plaza, 28th Floor
New York, NY 10004
(212) 269-5500

rschumacher@grsm.com
jecavanaugh@grsm.com
mramirez@grsm.com
jlowery@grsm.com
awilson@grsm.com
edimarco@grsm.com

1 **PARKER-HANNIFIN CORPORATION**

SNELL & WILMER L.L.P.

2 Tracy H. Fowler (Pro Hac Vice Pending)

Dawn L. Davis

3 3883 Howard Hughes Parkway, Suite 1100

Las Vegas, NV 89169

4 Telephone: (702) 784-5275

Facsimile: (702) 784-5252

5 tfowler@swlaw.com

6 ddavis@swlaw.com

7 **RAYTHEON TECHNOLOGIES CORPORATION F/K/A UNITED**
TECHNOLOGIES CORPORATION

8 EVANS FEARS & SCHUTTERT LLP

Jay J. Schuttert

9 Alexandria L. Layton

2300 West Sahara Avenue, Suite 950

10 Las Vegas, Nevada 89102

Telephone: 702-805-0290

11 Facsimile: 702-805-0291

12 jschuttert@efstriallaw.com

alayton@efstriallaw.com

13 **ROGERS CORPORATION**

14 MESSNER REEVES LLP

David J. Mortenson

15 Jessica Gandy

8945 West Russell Road, Suite 300

16 Las Vegas, Nevada 89148

Telephone: (702) 363-5100

17 Facsimile: (702) 363-5101

18 dmortensen@messner.com

Jgandy@messner.com

1 **TELEFLEX INCORPORATED**

2 CLARK HILL LLP

3 Gerald P. Schneeweis

4 Kyle Fellenz

5 One America Plaza

600 West Broadway, Suite 500

San Diego, CA 92101

Telephone: (619) 819-2421

Facsimile: (619) 557-0460

6 CLARK HILL PLLC

7 *Anticipated Counsel*

8 Nicholas M. Wieczorek

3800 Howard Hughes Parkway

9 Suite 500

Las Vegas, NV 89169

10 gschneeweis@clarkhill.com

11 kfellenz@clarkhill.com

nwieczorek@clarkhill.com

12 **TIGHTICO INCORPORATED**

13 LEWIS BRISBOIS GISGAARD & SMITH LLP

14 Steven Abbott

15 Michael R. Smith

6385 S. Rainbow Boulevard, Suite 600

Las Vegas, Nevada 89118

16 TELEPHONE: (702) 893-3383

FACSIMILE: (702) 893-3789

17 Steven.abbott@lewisbrisbois.com

Michael.r.smith@lewisbrisbois.com

18 **TIFEFLEX COMMERICAL, INC.**

19 EVANS FEARS & SCHUTTERT LLP

20 Jay J. Schuttert

Alexandria L. Layton

2300 West Sahara Avenue, Suite 950

Las Vegas, Nevada 89102

21 Telephone: 702-805-0290

22 Facsimile: 702-805-0291

jschuttert@efstriallaw.com

23 alayton@efstriallaw.com

WYETH HOLDINGS LLC f/k/a AMERICAN CYANAMID COMPANY

KING & SPALDING LLP

Ingrid A. Myers

1100 Louisiana Street, Suite 1400

Houston, Texas 77002

Telephone: (713) 751-3200

lmyers@kslaw.com

and

Troy D. McMahan

50 California Street, Suite 3300

San Francisco, CA 94111

Telephone: 415-318-1205

tMcMahan@kslaw.com

and

ROBERT J. CALDWELL

One Summerlin

980 Festival Plaza Drive, Suite 700

Las Vegas, Nevada 89135

Telephone: 702-699-5907

Facsimile: 702-597-5503

RCaldwell@foxrothschild.com

/s/ Julia Lund

An Employee of MAUNE RAICHLE HARTLEY
FRENCH & MUDD, LLC