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11 Attorneys for Defendants

12
13 UNITED STATES DISTRICT COURT
14 FOR THE DISTRICT OF NEVADA

15
16 MARIA TSATAS, an individual;
17 LEONIDAS VALKANAS, as trustee
of the KEET TRUST dates August 1,
18 2015; RAYMOND BARAZ, an
individual; PASCAL ABDALLAH, an
19 individual; JIMMY TSOUTSOURAS,
an individual; FOTINI VENETIS, an
individual; NICHOLAS
20 TSOUTSOURAS, an individual;
CONNIE TSOUTSOURAS, an
21 individual; RAYMONDE KANHA, an
individual; ALFRED BEKHIT, an
22 individual; JACQUEZ ELBAZ, an
individual; MARTINE BENEZRA, an
23 individual; JAMES P. CARROLL, an
individual; DAVID CHIN, an
24 individual; JENNIFER MILLS, an
individual; PAUL SUBLETT, an
25 individual; ANDREW SUBLETT, an
individual; MANOLIS KOSTAS, an
26 individual; ESTHER
GEORGAKOPOULOS, an individual;
27 EVAGELIA KOSTAKIS, an
individual; DENIS PARSONS, an
28 individual; SOFIA KARDARAS, an

Case No.: 2:20-cv-02045-RFB-BNW

**STIPULATION TO EXTEND TIME
TO FILE OPPOSITIONS AND
REPLY BRIEFS TO MOTIONS TO
COMPEL (ECF Nos. 66 – 73)**

(Second Request)

00185410

SECOND STIPULATION TO EXTEND TIME TO FILE OPPOSITIONS AND REPLY BRIEFS TO MOTIONS TO
COMPEL

1 individual; JIMMY ASMAKLIS, an
individual; CORRADINO GALUPPO,
2 an individual; DENIS KOPITAS, an
individual; TERRY TSATAS, an
3 individual; GEORGE TSATAS, an
individual; PANAGIOTA TSATAS, an
4 individual; OURANIA TSATAS, an
individual; KIRIAKOS PRIMBAS, an
5 individual; EVANTHIA PRIMBAS, an
individual; PATRICK AYOUB, an
6 individual; MICHAEL BESCEC, an
individual; ERNEST LEBOEUF, an
7 individual; PHILIPPE LEGAULT, an
individual; EFTIHIOS LITSAKIS, an
8 individual; GIOVANNI MONCADA,
an individual; MARC RIEL, an
9 individual; JARADEH SALIM, an
individual; HANI HAMAM, an
10 individual; CONSTANTIN ZISSIS, an
individual; BESSIE PEPPAS, an
11 individual; NIKI PALIOVRAKAS, an
individual

12
13 Plaintiffs,

14 v.

15 AIRBORNE WIRELESS NETWORK,
INC., a Nevada Corporation;
MICHAEL J. WARREN, an
16 individual; J. EDWARD DANIELS, an
individual; MARIUS DE MOS, an
17 individual; JASON DE MOS, an
individual; ROBERT BRUCE
18 HARRIS, an individual; KELLY
KABILAFKAS, an individual; and
19 APCENTIVE, INC., a Nevada
Corporation,

20 Defendants.
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00185410

1 **STIPULATION TO EXTEND TIME TO FILE OPPOSITIONS AND REPLIES**

2 Plaintiffs (as listed in the above caption) and Defendants (as listed in the above
3 caption) (together, the “Parties”), by and through their undersigned counsel of record,
4 submit this Stipulation to Extend Time to File Oppositions and Replies pursuant to LR
5 IA 6-1, LR IA 6-2, and LR 7-1.

6 WHEREAS, on August 27, 2021, Plaintiffs filed eight (8) Motions to Compel
7 (ECF Nos. 66, 67, 68, 69, 70, 71, 72, 73), and on August 31, 2021, the Court set hearing
8 dates on the Motions to Compel as follows (ECF No. 75):

- 9 • October 26, 2021 at 10:00 a.m. (ECF Nos. 66, 67, 68).
- 10 • October 28, 2021 at 10:00 a.m. (ECF Nos. 69, 70, 71).
- 11 • November 3, 2021 at 10:00 a.m. (ECF Nos. 72, 73).

12 WHEREAS, at the September 3, 2021 hearing on Defendants’ Motion to Dismiss
13 (ECF No. 39), Rule 11 Motion (ECF No. 50), and Motion to Stay (ECF No. 53), the
14 Court ordered the Parties to further meet and confer regarding the Motions to Compel
15 (ECF Nos. 66, 67, 68, 69, 70, 71, 72, 73) in light of its rulings that day (ECF No. 76);

16 WHEREAS, the Parties agreed thereafter that they needed additional time to
17 meaningfully have further meet and confer discussions and filed a stipulation for the
18 same (ECF No. 76);

19 WHEREAS, on September 9, 2021, the Court granted the Parties Stipulation and
20 Ordered Defendants’ Oppositions to the Motions to Compel to be filed by October 1,
21 2021 and Plaintiffs’ Replies are to be filed by October 8, 2021 (ECF No. 78);

22 WHEREAS, since the Court’s Order, Defendants have agreed to provide
23 supplemental responses to many of the discovery requests at issue;

24 WHEREAS, Plaintiffs reserve the right to argue that Defendants should
25 nonetheless be sanctioned for not providing supplemental responses before the Motions
26 to Compel were filed;

27 WHERAS, Plaintiffs also reserve the right to argue that any supplemental
28 responses Defendants may provide are still inadequate;

1 THEREFORE, IT IS HEREBY STIPULATED AND AGREED between the
2 Parties, by and through their respective attorneys of record, that, for good cause, the
3 deadlines to file Opposition and Replies to the Motions to Compel (ECF Nos. 66, 67,
4 68, 69, 70, 71, 72, 73) are extended by one week as follows:
5

6 Current deadline to file Oppositions to 7 Motions to Compel (ECF Nos. 66, 67, 68, 8 69, 70, 71, 72, 73)	October 1, 2021
9 New deadline to file Oppositions to 10 Motions to Compel (ECF Nos. 66, 67, 68, 11 69, 70, 71, 72, 73)	October 8, 2021
12 Current deadline to file Replies re Motions 13 to Compel (ECF Nos. 66, 67, 68, 69, 70, 14 71, 72, 73)	October 8, 2021
15 New deadline to file Replies re Motions 16 to Compel (ECF Nos. 66, 67, 68, 69, 70, 17 71, 72, 73)	October 15, 2021

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20 **IT IS SO STIPULATED.**

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Dated: September 29, 2021

NOVIAN & NOVIAN, LLP

By: s/ Andrew B. Goodman
ANDREW B. GOODMAN
Attorneys for Plaintiffs

Dated: September 29, 2021

THE MALONEY FIRM, APC

By: s/ Gregory M. Smith
GREGORY M. SMITH
Attorneys for Defendants

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

Dated: September 30, 2021

1 **CERTIFICATE OF SERVICE**

2 I certify that all counsel of record who are deemed to have consented to electronic service
3 are being served with a true and correct copy of the above document on September 29, 2021, via
4 the Court's CM/ECF system. Any other parties or counsel of record will be served by regular
5 and/or electronic mail.

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7 By: s/ Gregory M. Smith
8 GREGORY M. SMITH
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