

1 Bradley S. Slighting, Esq.
 Nevada Bar No. 10225
 2 SLIGHTING LAW
 1707 Village Center Cir, Ste 100
 3 Las Vegas, NV 89134
 4 Tel: (702) 232-2543
 brad@slightinglaw.com

5 Justin L. James, Esq.
 6 *Pro Hac Vice*
 Utah Bar No. 15167
 7 JAMES DODGE RUSSELL & STEPHENS PC
 8 10 W. Broadway, Suite 400
 Salt Lake City, UT 84101
 9 Tel: (801) 363-6363
 jjames@jdrslaw.com

10
 11 *Attorneys for Defendant/Counterclaimant*
 12 *Ivan Tapia and Defendants Angela Cruikshank,*
Jeff Cruikshank, and Justin Owens

13 **UNITED STATES DISTRICT COURT**
 14 **DISTRICT OF NEVADA**

15 INTERNATIONAL MARKETS LIVE INC.,
 a New York corporation dba IM MASTERY
 16 ACADEMY,

17 Plaintiff,

18 v.

19 DAVID IMONITIE an individual; SPELA
 20 SLUGA, an individual; DEVON ROESER,
 an individual; IVAN TAPIA, an individual;
 21 NVISIONU, INC., a Delaware corporation;
 22 ILYKIT, LLC, a Utah limited liability
 company, LUCAS LONGMIRE, an
 23 individual; NATHAN SAMUEL, an
 individual; MICHAEL ZHOR, an individual;
 24 IMRAN RICHIE, an individual; JUSTIN
 OWENS, an individual; PAULO
 25 CAVALLERI, an individual; JOSE
 MIGUEL CONTREAS, an individual; BASS
 26 GRANT, an individual; ANGELA
 27 CRUIKSHANK, an individual; JEFF
 CRUIKSHANK, an individual; VINCE
 28 MURPHY, an individual; GARY
 MCSWEEN, an individual; KATRINA

Case No.: 2:22-CV-01863-GMN-BNW

**STIPULATION AND [PROPOSED]
 ORDER RE: EXTENSION OF TIME FOR
 FILING OF DEFENDANTS' REPLIES TO
 PLAINTIFF'S RESPONSES TO
 DEFENDANTS' MOTIONS TO DISMISS
 (ECF NOS. 168 AND 169) (FIRST
 REQUEST)**

1 WORGESS, an individual; LUIS
2 RONALDO HARNANDEZ ARRIAGA, an
3 individual; STEPHANIA AYO, an
4 individual; SILVIA AYO, an individual;
5 CATALINA VASQUEZ, an individual;
6 MATHIAS VASQUEZ, an individual;
7 DOES 1 through 10, inclusive; and ROE
8 CORPORATIONS I through X, inclusive,
9
10 Defendants.

11 AND ALL RELATED MATTERS

12 **STIPULATION AND [PROPOSED] ORDER**

13 Defendants Angela Cruikshank, Jeff Cruikshank, and Justin Owens (“Defendants”), and
14 Plaintiff International Markets Live, Inc. dba IM Mastery Academy (“Plaintiff”), (collectively, the
15 “Parties”) by and through their respective undersigned counsel of record, the law firms of Slighting
16 Law, James Dodge Russell & Stephens PC, Kerr Simpson Attorneys at Law, and Holland & Hart
17 LLP, hereby stipulate and agree to extend the deadline for Defendants to file their Replies to
18 Plaintiff’s Responses to Defendants’ Motions to Dismiss (ECF. Nos. 168 and 169; filed 5/12/23).
19 This is the first stipulation between the Parties to extend the time for Defendants to reply to
20 Plaintiff’s Responses to Defendants’ Motions to Dismiss. The Parties hereby specifically agree and
21 stipulate as follows:

22
23 WHEREAS, on May 1, 2023, Defendants Angela Cruikshank and Jeff Cruikshank filed
24 their Motion to Dismiss Plaintiff’s First Amended Complaint (ECF No. 47) Pursuant to FRCP
25 12(b)(2) for Lack of Personal Jurisdiction (ECF No. 156).

26 WHEREAS, on May 1, 2023, Defendant Justin Owens filed his Motion to Dismiss
27 Plaintiff’s First Amended Complaint (ECF No. 47) Pursuant to FRCP 12(b)(2) for Lack of Personal
28 Jurisdiction (ECF No. 157).

1 WHEREAS, on May 12, 2023, Plaintiff filed its Responses to Defendants’ Motions to
2 Dismiss (ECF Nos. 168 and 169).

3 WHEREAS, on May 18, 2023, counsel for the Parties met and conferred via telephone and
4 agreed to allow Defendants an additional one (1) week of time from the current due date of May
5 19, 2023 to file their Replies to Plaintiff’s Responses to Defendants’ Motions to Dismiss, thereby
6 making such Replies due May 26, 2023.

7
8 WHEREAS, no parties oppose the extension of time for the filing of Defendants’ Replies to
9 Plaintiff’s Responses to Defendants’ Motions to Dismiss as set forth herein.

10 ///

11 ///

12 ///

13 ///

14 ///

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28

1 THEREFORE, the Parties jointly stipulate that the Court should enter an order allowing
2 Defendants to file their Replies to Plaintiff’s Responses to Defendants’ Motions to Dismiss by May
3 26, 2023.

4 Respectfully submitted, this 19th day of May 2023

5 **SLIGHTING LAW**

6 **WELLMAN AND WARREN LLP**

7 /s/Bradley S. Slighting
8 **Bradley S. Slighting, Esq.**
9 Nevada Bar No. 10225
10 1707 Village Center Cir, Ste 100
11 Las Vegas, NV 89134

12 /s/ Chris Wellman
13 **Chris Wellman, Esq. (Pro Hac Vice)**
14 California Bar No. 304700
15 24411 Ridge Route Dr., Unit 200
16 Laguna Hills, CA 92653

17 **JAMES DODGE RUSSELL & STEPHENS PC**

18 *Attorneys for Defendant/Counterclaimant*
19 *Defendant David Imonitie and Defendants*
20 *Spela Shuga, Devon Roeser, NVisionU, Inc.*
21 *Bass Grant, Lucas Longmire, and*
22 *Vince Murphy*

23 /s/ Justin L. James
24 **Justin L. James, Esq. (Pro Hac Vice)**
25 Utah Bar No. 15167
26 10 West Broadway, Suite 400
27 Salt Lake City, Utah 84101

28 *Attorneys for Defendant/Counterclaimant*
29 *Ivan Tapia and Defendants Angela Cruikshank,*
30 *Jeff Cruikshank, and Justin Owens*

31 **HOLLAND & HART LLP**

32 **THOMPSON BURTON, PLLC**

33 /s/ Jenapher Lin
34 Lars K. Evensen, Esq.
35 Nevada Bar No. 8061
36 **Jenapher Lin, Esq.**
37 Nevada Bar No. 14233
38 9555 Hillwood Drive, 2nd Floor
39 Las Vegas, NV 89134

40 /s/ Jon E. Field
41 **Jon E. Field, Esq.**
42 Nevada Bar No. 7700
43 One Franklin Park
44 6100 Tower Circle Suite 200
45 Franklin, TN 37067

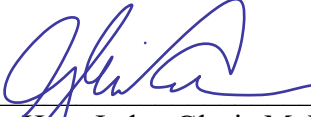
46 *Attorneys for Defendant ILYKIT, LLC*

47 P. Sterling Kerr, Esq.
48 Nevada Bar No. 3978
49 George E. Robinson, Esq.
50 Nevada Bar No. 9667
51 **KERR SIMPSON ATTORNEYS AT LAW**
52 2900 W. Horizon Ridge Parkway, Suite 200
53 Henderson, NV 89052

54 **IT IS SO ORDERED.**

55 Dated: May 22, 2023.

56 *Attorneys for Plaintiff/Counterdefendant*
57 *International Markets Live, Inc. and*
58 *Counterdefendant Christopher Terry*

59 
60 _____
61 The Hon. Judge Gloria M. Navarro
62 UNITED STATES DISTRICT JUDGE

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 19th day of May, 2023, a true and correct copy of the foregoing **STIPULATION AND [PROPOSED] ORDER RE: EXTENSION OF TIME FOR FILING OF DEFENDANTS’ REPLIES TO PLAINTIFF’S RESPONSES TO DEFENDANTS’ MOTIONS TO DISMISS (ECF NOS. 168 AND 169) (FIRST REQUEST)** was filed with the Clerk of the Court using the CM/ECF system which automatically sent notification of such filing to and served electronically upon the following counsel:

E-SERVICE LIST

Jon E. Field, Esq.
THOMPSON BURTON, PLLC
One Franklin Park
6100 Tower Circle Suite 200
Franklin, Tennessee 37067
Tel: (615) 465-6000
Email: jfield@thompsonburton.com
Attorney for Defendant ILYKIT, LLC

P. Sterling Kerr, Esq.
Nevada Bar No. 3978
George E. Robinson, Esq.
Nevada Bar No. 9667
KERR SIMPSON ATTORNEYS AT LAW
2900 W. Horizon Ridge Parkway, Suite 200
Henderson, NV 89052
Tel: (702) 451.2055
sterling@kerrsimpsonlaw.com
george@kerrsimpsonlaw.com

Bradley S. Slighting, Esq.
Nevada Bar No. 10225
SLIGHTING LAW
1707 Village Center Cir., Ste 100
Las Vegas, NV 89134
Tel: (702) 840-3749
Email: brad@slightinglaw.com

Lars K. Evensen, Esq.
Nevada Bar No. 8061
Jenapher Lin, Esq.
Nevada Bar No. 14233
HOLLAND & HART LLP
9555 Hillwood Drive, 2nd Floor
Las Vegas, NV 89134
Phone: (702) 669.4600
lkevensen@hollandhart.com
jlin@hollandhart.com

Chris Wellman, Esq.
Pro Hac Vice
California Bar No. 304700
WELLMAN AND WARREN LLP
24411 Ridge Route Dr., Unit 200
Laguna Hills, CA 92653
Email: cwellman@w-wlaw.com

*Attorneys for Plaintiff/Counterdefendant
International Markets Live, Inc. and
Counterdefendant Christopher Terry*

*Attorneys for Defendant/Counterclaimant
David Imonitie and Defendants Spela Sluga,
Devon Roeser, NVisionU, Inc., Bass Grant,
Lucas Longmire, and Vince Murphy*

/s/ Bradley S. Slighting

An employee of Slighting Law