

1 JODI DONETTA LOWRY, ESQ.
2 Nevada Bar No. 7798
3 jlowry@gibsonlexbury.com

4 **Gibson Lexbury LLP**
3027 East Sunset Road, Suite 208
5 Las Vegas, Nevada 89120
6 Telephone 702.541.7888
7 Facsimile 702.541.7899

8 *Attorneys for Defendants*

9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 JIANGXI PANDA FIREWORKS CO., LTD, a
12 Chinese entity;

Case No.: 2:23-cv-01232-MMD-DJA

13 Plaintiff,

**DEFENDANT 1.4G HOLDINGS, LLC’S
MOTION FOR LEAVE TO EXCEED
PAGE LIMITS FOR DEFENDANTS’
MOTION TO COMPEL PLAINTIFF
JIANGXI PANDA FIREWORKS CO.,
LTD’S RESPONSES TO DEFENDANT
1.4G HOLDINGS, LLC’S FIRST SETS
OF INTERROGATORIES**

14 v.

15 DOUGLAS BURDA, an individual;
16 KONCEPT LLC, a Nevada limited liability
company doing business as BURDA IP;
17 ELISSA BURDA, an individual, RED APPLE
FIREWORKS CO., LTD., a Nevada limited
liability company; 1.4G HOLDINGS, LLC, a
Nevada limited liability company,

18 Defendants.

19
20 Defendant 1.4g Holdings, LLC (“1.4g” or “Defendant”), by and through its counsel,
21 Gibson Lexbury LLP, hereby files this Motion for Leave to Exceed Page Limits for Defendants’
22 Motion to Compel Plaintiff Jiangxi Panda Fireworks Co., Ltd.’s (“Plaintiff”) Responses to 1.4g’s
23 First Set of Interrogatories (the “Interrogatories”) to Plaintiff (such motion for leave, the
24 “Motion”; such motion to compel, the “Motion to Compel”).

25 Defendant seeks to file a motion that is approximately 36 pages, including the certificate
26 of conference, the table of contents, and the table of authorities. It is necessary for Defendant to
27 file a motion that exceeds the page limits provided by LR 7-3 in order to comply with LR 26-
28 6(b). LR 26-6(b) provides that “[a]ll motions to compel discovery or for a protective order must

Gibson Lexbury LLP
3027 East Sunset Road, Suite 208
Las Vegas, Nevada 89120
Main (702) 541-7888 • Fax (702) 541-7899

1 set forth in full the text of the discovery originally sought and any response to it.” In order to
2 comply with LR 26-6, Defendant had to set forth the entirety of the interrogatories and Plaintiff’s
3 Responses, as each of Plaintiff’s responses were inadequate. Declaration of Jodi Donetta Lowry,
4 Esq. (“JDL Dec”) ¶ 3, attached hereto as **Exhibit 1**. In total, setting forth “in full the text of the
5 discovery originally sought and any response to it” required 16 pages. JDL Dec. ¶ 4. In addition,
6 because of the scope of the discovery responses challenged by the Motion to Compel at least 6
7 more pages were required to properly address each of Plaintiff’s discovery deficiencies. JDL
8 Dec. ¶ 5. Defendants are requesting to exceed page limits by as much as 12 pages, which is
9 reasonable considering the requirement to include the text of the discovery requests and
10 responses, the analysis, the table of contents and the table of authorities. Therefore, pursuant to
11 LR 7-3(c), good cause exists for the Motion to Compel to exceed the page limits provided in LR
12 7-3(b).

13 Respectfully submitted this 9th day of February, 2024.

14 **Gibson Lexbury LLP**

15 By /s/ J.D. Lowry
16 JODI DONETTA LOWY, ESQ.
17 Nevada Bar No. 7798
18 mshaffer@gibsonlexbury.com
19 3027 East Sunset Road, Suite 208
20 Las Vegas, Nevada 89120
21 (702) 589-5872 Telephone
22 (702) 541-7899 Facsimile

23 *Attorneys for Defendants*

24 IT IS SO ORDERED:

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26 UNITED STATES MAGISTRATE JUDGE

27 DATE: 2/13/2024

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CERTIFICATE OF SERVICE

Pursuant to Federal Rule of Civil Procedure 5, I certify under penalty of perjury under the laws of the United States that I am an employee of Gibson Lexbury LLP and that on February 9, 2024 I caused a correct copy of the foregoing **DEFENDANT 1.4G HOLDINGS, LLC’S MOTION FOR LEAVE TO EXCEED PAGE LIMITS FOR DEFENDANTS’ MOTION TO COMPEL PLAINTIFF JIANGXI PANDA FIREWORKS CO., LTD’S RESPONSES TO DEFENDANT 1.4G HOLDINGS, LLC’S FIRST SETS OF INTERROGATORIES** to be electronically filed via the CM/ECF system and thereby delivered by electronic means to all counsel of record.

/s/ Alec J.H. Wade
An employee of Gibson Lexbury LLP

Gibson Lexbury LLP
3027 East Sunset Road, Suite 208
Las Vegas, Nevada 89120
Main (702) 541-7888 • Fax (702) 541-7899

EXHIBIT 1

EXHIBIT 1

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Nevada Bar No. 7798
2 jlowry@gibsonlexbury.com

3
4 **Gibson Lexbury LLP**
3027 East Sunset Road, Suite 208
Las Vegas, Nevada 89120
5 Telephone 702.541.7888
6 Facsimile 702.541.7899

7 *Attorneys for Defendants*

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 JIANGXI PANDA FIREWORKS CO., LTD, a
Chinese entity;

11 Plaintiff,

12 v.

13 DOUGLAS BURDA, an individual;
14 KONCEPT LLC, a Nevada limited liability
company doing business as BURDA IP;
15 ELISSA BURDA, an individual, RED APPLE
FIREWORKS CO., LTD., a Nevada limited
16 liability company; 1.4G HOLDINGS, LLC, a
Nevada limited liability company,

17 Defendants.
18

Case No.: 2:23-cv-01232-MMD-DJA

**DECLARATION OF JODI DONETTA
LOWRY, ESQ. IN SUPPORT OF
DEFENDANT 1.4G HOLDINGS, LLC'S
MOTION FOR LEAVE TO EXCEED
PAGE LIMITS FOR DEFENDANTS'
MOTION TO COMPEL PLAINTIFF
JIANGXI PANDA FIREWORKS CO.,
LTD'S RESPONSES TO DEFENDANT
1.4G HOLDINGS, LLC'S FIRST SETS
OF INTERROGATORIES**

19
20 **DECLARATION OF JODI DONETTA LOWRY, ESQ.**

21 J.D. Lowry, Esq. states under penalty of perjury of the United States of America that the
22 following is true:

23 1. I am an attorney at Gibson Lexbury LLP, which represents Defendants in the
24 above-captioned matter. I am over eighteen years old and competent to testify to all matters set
25 forth in this Declaration.

26 2. It is necessary for Defendant to file a motion that exceeds the page limits provided
27 by LR 7-3 in order to comply with another local rule, LR 26-6(b).
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3. Defendant had to set forth the entirety of the interrogatories and Plaintiff Jiangxi Panda Fireworks Co., Ltd.’s (“Plaintiff”) responses as each of Plaintiff’s responses were inadequate.

4. In total, setting forth “in full the text of the discovery originally sought and any response to it” required approximately 16 pages.

5. The scope of the discovery challenged by the Defendants’ Motion to Compel Plaintiff’s Responses to Defendant 1.4g Holdings, LLC’s First Set of Interrogatories (the “Motion to Compel”) required more space, at least 6 more pages, to properly address each of Plaintiff’s discovery deficiencies.

Dated this 9th day of February, 2024.

/s/ J.D. Lowry
Jodi Donetta Lowry, Esq.