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 6 *Attorneys for Plaintiff*

7  
 8 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

9 LYNN THOMPSON,

10 Plaintiff,

11 vs.

12 TESLA MOTORS, INC.; ONQGLOBAL,  
 13 INC.; DOES 1-50,

14 Defendants.  
 15

CASE NO.: 3:21-cv-00238-HDM-CSD

STIPULATION AND ORDER TO  
 EXTEND TIME FOR PLAINTIFF TO FILE  
 HIS REPLY IN SUPPORT OF MOTION  
 FOR LEAVE TO FILE FIRST AMENDED  
 COMPLAINT

(FIRST REQUEST)

16  
 17 Plaintiff LYNN THOMPSON (“Plaintiff”), and Defendants TESLA MOTORS, INC.  
 18 (“Tesla”) and ONQGLOBAL, INC. (“OnQ”), by and through their respective attorneys of  
 19 record, hereby submit that Plaintiff shall have an extension of time up to and including Monday,  
 20 January 23, 2023, in which to file a reply in support of Plaintiff’s Motion for Leave to File First  
 21 Amended Complaint. [ECF 78]. This Stipulation is submitted and based upon the following:

- 22 1. On December 5, 2022, Plaintiff filed his Motion for Leave to File First Amended  
 23 Complaint (“Motion”). [ECF 78].
- 24 2. On January 5, 2023, Defendants filed their respective responses along with  
 25 supporting papers to Plaintiff’s Motion. [ECF 81-85].
- 26 3. Plaintiff’s reply brief in support of his Motion is currently due January 12, 2023.

27  
 28 **STIPULATION AND ORDER TO EXTEND TIME FOR PLAINTIFF TO FILE HIS REPLY IN**  
**SUPPORT OF MOTION FOR LEAVE TO FILE FIRST AMENDED COMPLAINT (FIRST REQUEST)**

- 1 4. Unfortunately, Plaintiff's counsel has an on-going family emergency that is limiting  
2 her ability to prepare the reply brief. Plaintiff's counsel requests additional time to  
3 consult with Plaintiff and to prepare the brief.
- 4 5. As such, the parties have agreed to continue the due date for Plaintiff's reply brief  
5 to Monday, January 23, 2023.
- 6 6. This is the first request to extend the deadline for Plaintiff's reply brief in support  
7 of his Motion [ECF 78] and is not made for purposes of undue delay.

8 Dated: January 9, 2023.

9 **HKM EMPLOYMENT ATTORNEYS, LLP JACKSON LEWIS P.C.**

10 /s/ JENNY L. FOLEY

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/s/ KYLE J. HOYT

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*Attorneys for Defendant Tesla Motors, Inc.*

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*Attorneys for Defendant OnQGlobal, Inc.*

**STIPULATION AND ORDER TO EXTEND TIME FOR PLAINTIFF TO FILE HIS REPLY IN  
SUPPORT OF MOTION FOR LEAVE TO FILE FIRST AMENDED COMPLAINT (FIRST REQUEST)**

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ORDER

IT IS SO ORDERED:



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UNITED STATES MAGISTRATE JUDGE  
CASE NO.: 3:21-cv-00238-HDM-CSD

DATED: January 9, 2023

# EXHIBIT 1

## Damas, Gabriela

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**From:** Pierce, Shannon <SPierce@fennemorelaw.com>  
**Sent:** Monday, January 9, 2023 9:58 AM  
**To:** Hoyt, Kyle J. (Las Vegas); Arata, Mike; Foley, Jenny  
**Cc:** Damas, Gabriela; 36f4c7597+matter1414394927@maildrop.clio.com; Sliker, Joshua A. (Las Vegas); Beavers, Wade  
**Subject:** RE: Thompson v. Tesla Motors Inc., et al. -- Reply Briefs re: Motion for Leave

Same here.

Shannon S. Pierce, she/her  
Director

---

# FENNEMORE.

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**From:** Hoyt, Kyle J. (Las Vegas) <Kyle.Hoyt@jacksonlewis.com>  
**Sent:** Monday, January 9, 2023 9:57 AM  
**To:** Arata, Mike <marata@hkm.com>; Pierce, Shannon <SPierce@fennemorelaw.com>; Foley, Jenny <JFoley@hkm.com>  
**Cc:** Damas, Gabriela <gdamas@hkm.com>; 36f4c7597+matter1414394927@maildrop.clio.com; Sliker, Joshua A. (Las Vegas) <Joshua.Sliker@Jacksonlewis.com>; Beavers, Wade <WBeavers@fennemorelaw.com>  
**Subject:** RE: Thompson v. Tesla Motors Inc., et al. -- Reply Briefs re: Motion for Leave

Thanks Mike – this looks good to me and can be submitted with my signature.



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**Subject:** RE: Thompson v. Tesla Motors Inc., et al. -- Reply Briefs re: Motion for Leave

**[EXTERNAL SENDER]**

Hi Shannon and Kyle:

Here is the proposed stipulation extending the reply brief due date for your review and approval.

Please let me know if you have any edits or if we can submit the stipulation with your electronic signatures.

Thanks again,  
Mike



Mike Arata  
Attorney

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Thank you, Shannon and Kyle. Your courtesy is greatly appreciated. We will prepare the stipulation.



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**From:** Hoyt, Kyle J. (Las Vegas) <[Kyle.Hoyt@jacksonlewis.com](mailto:Kyle.Hoyt@jacksonlewis.com)>  
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**Cc:** Damas, Gabriela <[gdamas@hkm.com](mailto:gdamas@hkm.com)>; [36f4c7597+matter1414394927@maildrop.clio.com](mailto:36f4c7597+matter1414394927@maildrop.clio.com); Pierce, Shannon <[SPierce@fennemorelaw.com](mailto:SPierce@fennemorelaw.com)>; Sliker, Joshua A. (Las Vegas) <[Joshua.Sliker@Jacksonlewis.com](mailto:Joshua.Sliker@Jacksonlewis.com)>  
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Yes an extension to the 23<sup>rd</sup> is fine.



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**Subject:** Thompson v. Tesla Motors Inc., et al. -- Reply Briefs re: Motion for Leave

**[EXTERNAL SENDER]**

Hi Wade and Kyle:

We've received your clients' respective responses to Plaintiff's Motion for Leave to File First Amended Complaint.

The replies are currently due January 12, 2023. Are your clients willing to stipulate to extend the due date to January 23, 2023? If so, we can prepare the stipulation.

Please let me know if you would like to discuss this further, (702) 674-9270.

Thanks,  
Mike



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Attorney

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