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9 *Attorneys for Plaintiff*

10 **IN THE UNITED STATES DISTRICT COURT**
 11 **EASTERN DISTRICT OF CALIFORNIA**

12
 13 SOLARMORE MANAGEMENT
 SERVICES, INC., a California corporation,

14 Plaintiff,

15 v.

16 JEFF CARPOFF and PAULETTE
 17 CARPOFF, husband and wife; LAUREN
 CARPOFF, an individual; ROBERT V.
 18 AMATO, an individual; PRISCILLA
 AMATO, an individual; ROBERT
 19 KARMANN, an individual; RONALD J.
 ROACH, an individual; JOSEPH BAYLISS,
 20 an individual; BAYLISS INNOVATIVE
 SERVICES, INC., a California corporation;
 21 ARI J. LAUER, an individual; LAW
 OFFICES OF ARI J. LAUER; ALAN
 22 HANSEN; an individual; SEBASTIAN
 JANO, an individual; STEVE WILDE, an
 23 individual; RYAN GUIDRY, an individual;
 CARRIE CARPOFF-BODEN, an individual;
 24 PATRICK MOORE, an individual; HALO
 MANAGEMENT SERVICES LLC, a
 25 Nevada limited liability company;
 ALVAREZ & MARSAL VALUATION
 26 SERVICES, LLC, a Delaware limited
 liability company; BARRY HACKER, an
 27 individual; MARSHALL & STEVENS, INC.,
 a Delaware corporation; COHNREZNICK

Case No. 2:19-cv-02544-JAM-DB

**STIPULATION FOR EXTENDING
 TIME FOR BARRY HACKER TO
 RESPOND TO FIRST AMENDED
 COMPLAINT AND ORDER**

Complaint Served: January 29, 2021
 Response Deadline: March 30, 2021
 New Response Deadline: May 12, 2021

1 **STIPULATION FOR EXTENDING TIME FOR
 BARRY HACKER TO RESPOND TO FIRST
 AMENDED COMPLAINT AND ORDER**

Snell & Wilmer
 LLP
 LAW OFFICES
 50 W. Liberty Street, Suite 510
 Reno, Nevada 89501
 775.785.5440

1 CAPITAL MARKETS SECURITIES, LLC, a
Maryland limited liability company;
2 FALLBROOK CAPITAL SECURITIES
CORPORATION, a Florida corporation;
3 SCOTT WENTZ, an individual; RAINA
YEE, an individual; VISTRA
4 INTERNATIONAL EXPANSION (USA)
INC., fka RADIUS GGE (USA), INC., fka
5 HIGH STREET PARTNERS INC., a
Maryland corporation; RADIUS GGE (USA),
6 INC., fka HIGH STREET PARTNERS INC.,
a Maryland corporation; MONTAGE
7 SERVICES, INC., a California corporation;
HERITAGE BANK OF COMMERCE, a
8 California corporation; DIANA KERSHAW,
an individual; CARSON TRAILER, INC., a
9 California corporation; DAVID ENDRES, an
individual; AHERN RENTALS INC., a
10 Nevada corporation, AHERN AD, LLC, a
Nevada limited liability company; EVAN
11 AHERN, an individual; THE STRAUSS
LAW FIRM, LLC, a South Carolina limited
12 liability company; PETER STRAUSS, an
individual; PANDA BEAR
13 INTERNATIONAL, LTD., a Hong Kong
corporation; PANDA SOLAR SOLUTIONS
14 LLC, a Nevada limited liability corporation;
DC SOLAR INTERNATIONAL, INC., a
15 Nevis corporation; BAYSHORE SELECT
INSURANCE, a Bahamian Corporation;
16 CHAMPION SELECT INSURANCE, a
Bahamian Corporation; JPLM DYNASTY
17 TRUST, a Cook Island Trust; BILLIE JEAN
TRUST, a Cook Island Trust; SOUTHPAC
18 INTERNATIONAL, INC., a Cook Islands
Corporation,

19
20 Defendants.

21 IT IS HEREBY STIPULATED by and between Solarmore Management Services,
22 Inc. (“Solarmore”) and Barry Hacker (“Defendant”) (collectively, the “Parties”), either for
23 themselves or by and through their respective counsel, that:

24 Solarmore filed its First Amended Complaint in this Court on December 18, 2020.
25 The Defendant’s waiver of service was requested on January 29, 2021;

26 Since Defendant executed a waiver of service for the First Amended Complaint, his
27 response to Solarmore’s First Amended Complaint is not due until March 30, 2021;

28 2 **STIPULATION FOR EXTENDING TIME FOR
BARRY HACKER TO RESPOND TO FIRST
AMENDED COMPLAINT AND ORDER**

1 Counsel for Solarmore and the Defendant have met and conferred regarding the
2 Defendant's deadline to respond to Solarmore's First Amended Complaint, and the Parties
3 have agreed to extend this deadline to May 12, 2021. In light of the agreed upon extension,
4 the Parties have also agreed that it is in the best interest of the Parties and this Court to also
5 extend the Parties' deadline to submit a joint status report that includes the Rule 26(f)
6 discovery plan to May 21, 2021.

7 This is the first request for an extension.

8 THEREFORE, pursuant to L. R. 143 and 144, the Parties hereby stipulate to extend
9 the time for the Defendant to respond to Solarmore's First Amended Complaint as follows:

10 1. The deadline for the Defendant to answer, object or otherwise respond to
11 Solarmore Management Services, Inc.'s First Amended Complaint shall be May 12, 2021.

12 2. The deadline for the Parties to submit to the Court a joint status report that
13 includes the Rule 26(f) discovery plan shall be May 21, 2021.

14 **IT IS SO STIPULATED.**

15 DATED: March 30, 2021

DATED: March 30, 2021

16 **SNELL & WILMER L.L.P.**

**HOMER BONNER JACOBS ORTIZ,
P.A.**

17 By: /s/ Nathan G. Kanute
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By: /s/ Andrew Herron (with permission)
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Attorneys for Barry Hacker

Attorneys for Plaintiff

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IT IS SO ORDERED.

DATED: March 31, 2021

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
UNITED STATES DISTRICT COURT JUDGE