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13 Attorneys for Millennium Drilling Co., Inc.,
 14 Jonathan Feldman and Patriot Exploration
 Company, LLC

**UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF NEVADA**

17 Millennium Drilling Co., Inc., a Delaware
 Corporation,
 18
 19 Plaintiff,

20 vs.

21 Beverly House-Meyers Revocable Trust,
 22 Beverly House-Meyers, Trustee; Grace Mae
 Properties, LLC; Hamrick Trust, Robert H.
 23 Hamrick and Molly Kay Hamrick, Trustees;
 24 DOES I through X; and ROES I through X,
 25 Defendants.

26 Molly Hamrick, Beverly House-Myers, R&M
 27 Hamrick Family Trust;
 28 Third-Party Plaintiffs,

CASE NO.: 2:12-cv-00462-MMD-CWH
 (Base case)

**STIPULATION AND [PROPOSED]
 ORDER TO EXTEND DEADLINE TO
 FILE REPLIES**

(First Request)

CASE NO.: 2:13-cv-00078-MMD-CWH
 (Consolidated Case)

HOWARD & HOWARD ATTORNEYS PLLC
 3800 Howard Hughes Pkwy., Suite 1000
 Las Vegas, NV 89169
 (702) 257-1483

1 vs.

2 Jonathan Feldman, Montcalm, LLC, Patriot
3 Exploration Company, LLC, Carter Henson,
4 Jr., Matthew Barnes, Robert Holt, Elizabeth
5 Holt, and Schain, Leifer, Guralnick,

6
7 Third-Party Defendants.

8 Third-Party Defendants JONATHAN FELDMAN (“Feldman”), CARTER HENSON,
9 JR. (“Henson”), and PATRIOT EXPLORATION COMPANY, LLC (“Patriot”) (collectively,
10 the “Patriot Defendants”), Plaintiff MILLENNIUM DRILLING CO., Inc. (“Millennium”) and
11 Third-Party Plaintiffs/Defendants MOLLY HAMRICK, BEVERLY HOUSE-MYERS,
12 BEVERLY HOUSE-MYERS REVOCABLE TRUST, GRACE MAE PROPERTIES, LLC,
13 HAMRICK TRUST, ROBERT H. HAMRICK and R&M HAMRICK FAMILY TRUST
14 (collectively, the “Third-Party Plaintiffs”), by and through their respective undersigned counsel,
15 stipulate on the following and request an Order from this Court granting such stipulation:

16 1. On March 30, 2015, the Third-Party Plaintiffs filed their Points and Authorities
17 in Response to Third-Party Defendants Jonathan Feldman and Patriot Exploration Company’s
18 Omnibus Motion Re: (1) Partial Summary Judgment – Statute of Limitations; (2) Summary
19 Judgment for Res Judicata or Collateral Estoppel; and (3) Summary Judgment on Third-Party
20 Plaintiffs’ Claims for (1) Breach of Fiduciary Duty; (2) Breach of Contract; (3) Imposition of
21 Constructive Trust; (4) Unjust Enrichment; and (5) Money Had and Received. (Dkt. No. 214).

22 2. Additionally, on March 30, 2015, the Third-Party Plaintiffs filed their Points and
23 Authorities in Response to Third-Party Defendant Carter Henson’s Motion to Dismiss for Lack
24 of Personal Jurisdiction (Dkt. No. 215).

25 3. The Patriot Defendants’ Replies for the above-referenced Motions are due on
26 April 16, 2015.

27 4. This is the Patriot Defendants’ first request for entry of an agreed stipulation
28 extending the Reply deadlines for the above-referenced Motions.

1 5. Having discussed between counsel for the Third-Party Plaintiffs and the Patriot
2 Defendants, all parties are in agreement to extend the Patriot Defendants' deadline to file their
3 Replies to the above-referenced Motions to April 28, 2015.

4 6. IT IS HEREBY STIPULATED AND AGREED that the deadlines for the Patriot
5 Defendants' Replies to the above-referenced Motions are extended from April 16, 2015 to April
6 28, 2015.

7 **HOWARD & HOWARD ATTORNEYS**
8 **PLLC**

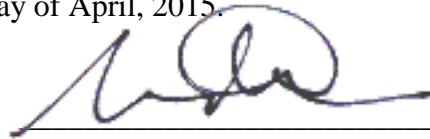
FEE SMITH SHARP & VITULLO LLP

9 /s/ Wade B. Gochnour
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16 Company, LLC

/s/ Lance L. Livingston
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18 Lance L. Livingston, Esq. (Pro Hac Vice)
19 Three Galleria Tower
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21 Dallas, TX 75240
22 Attorneys for Third-Party Plaintiffs and
23 Defendants

24 **ORDER**

25 **IT IS SO ORDERED** this 15th day of April, 2015.



26 **UNITED STATES DISTRICT COURT JUDGE**

27 Respectfully submitted by:

28 **HOWARD & HOWARD ATTORNEYS PLLC**

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