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

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

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

20 vs.

21 Beverly House-Meyers Revocable Trust,
 22 Beverly House-Meyers, Trustee; Grace Mae
 23 Properties, LLC; Hamrick Trust, Robert H.
 24 Hamrick and Molly Kay Hamrick, Trustees;
 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**
(Second 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 to 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 Parties submitted a Stipulation and [Proposed] Order To Extend Deadline to
26 File Replies (First Request) on April 15, 2015 (Dkt. No. 216) seeking to extend the deadline for
27 the Replies to both motions to April 28, 2015.

28 4. The Court issued an order granting the Stipulation and [Proposed] Order to
Extend Deadline to File Replies (First Request) on April 16, 2015 (Dkt. No. 217).

1 5. The parties are seeking to mediate this matter, and have obtained dates for a
2 potential mediation during the week of June 8-12, 2015.

3 6. The parties want to ensure that the Court does not rule on the pending motions
4 until after the parties have had a chance to conduct the planned mediation.

5 7. In order to allow the parties to conduct the mediation without the Court having to
6 consider and possibly rule on the pending Motions, all parties are in agreement to extend the
7 Patriot Defendants' deadline to file their Replies to the above-referenced Motions to June 19,
8 2015.

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1 8. IT IS HEREBY STIPULATED AND AGREED that the deadlines for the Patriot
2 Defendants' Replies to the above-referenced Motions are extended from April 28, 2015 to June
3 19, 2015.

4 **HOWARD & HOWARD ATTORNEYS
5 PLLC**

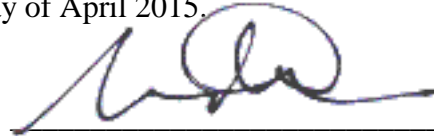
FEE SMITH SHARP & VITULLO LLP

6 /s/ Wade B. Gochnour _____
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/s/ Lance L. Livingston _____
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Defendants

ORDER

IT IS SO ORDERED this 28th day of April 2015.



UNITED STATES DISTRICT COURT JUDGE

18 Respectfully submitted by:

19 **HOWARD & HOWARD ATTORNEYS PLLC**

20 /s/ Wade B. Gochnour _____
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28 4833-8190-8259, v. 1

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