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26 Jonathan Feldman and Patriot Exploration
27 Company, LLC

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

29 Millennium Drilling Co., Inc., a Delaware
30 Corporation,

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

33 Plaintiff,

34 vs.
35

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

36

(Second Request)

37 Beverly House-Meyers Revocable Trust,
38 Beverly House-Meyers, Trustee; Grace Mae
39 Properties, LLC; Hamrick Trust, Robert H.
40 Hamrick and Molly Kay Hamrick, Trustees;
41 DOES I through X; and ROES I through X,

42 Defendants.

43

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

45 Molly Hamrick, Beverly House-Myers, R&M
46 Hamrick Family Trust;

47 Third-Party Plaintiffs,

1 vs.

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

5 Third-Party Defendants.

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

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

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

24 3. The Parties submitted a Stipulation and [Proposed] Order To Extend Deadline to
25 File Replies (First Request) on April 15, 2015 (Dkt. No. 216) seeking to extend the deadline for
26 the Replies to both motions to April 28, 2015.

27 4. The Court issued an order granting the Stipulation and [Proposed] Order to
28 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**

6 /s/ Wade B. Gochnour

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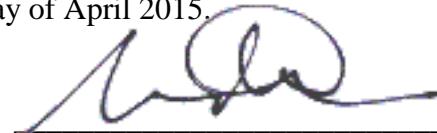
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/s/ Lance L. Livingston

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11 **ORDER**

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



13 **UNITED STATES DISTRICT COURT JUDGE**

14 Respectfully submitted by:

15 **HOWARD & HOWARD ATTORNEYS PLLC**

16 /s/ Wade B. Gochnour

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