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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
 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**

(Third 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. Because the parties were seeing to mediate the case between June 8-12, 2015, the
2 parties submitted a Stipulation and [Proposed] Order To Extend Deadline to File Replies
3 (Second Request) on April 28, 2015 (Dkt. No. 218) seeking to extend the deadline for the
4 Replies to both motions to Friday, June 19, 2015.

5 6. The Court issued an order granting the Stipulation and [Proposed] Order to
6 Extend Deadline to File Replies (Second Request) on April 29, 2015 (Dkt. No. 219)

7 7. Due to the schedule of the parties, their counsel and the available mediators, the
8 matter was not set for meditation until Tuesday, June 16, 2015, before Eleissa Lavelle.
9 Unfortunately, the matter did not resolve at the mediation.

10 8. Because the mediation was not held until later than expected, and due to a
11 medical procedure that counsel for the Patriot Defendants' had to undergo on Wednesday, June
12 17, 2015, the parties have agreed to a one-week extension to submit the Replies to both
13 motions.

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1 9. IT IS HEREBY STIPULATED AND AGREED that the deadlines for the Patriot
2 Defendants' Replies to the above-referenced Motions be extended from June 19, 2015 to June
3 26, 2015.

4 **HOWARD & HOWARD ATTORNEYS
5 PLLC**

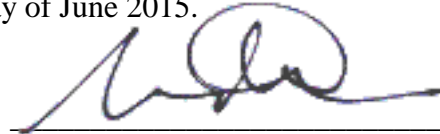
FEE SMITH SHARP & VITULLO LLP

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/s/ Lance L. Livingston _____
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Attorneys for Third-Party Plaintiffs and
Defendants

ORDER

IT IS SO ORDERED this 22nd day of June 2015.



UNITED STATES DISTRICT COURT JUDGE

18 Respectfully submitted by:

19 **HOWARD & HOWARD ATTORNEYS PLLC**

20 /s/ Wade B. Gochnour _____
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