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 Jonathan Feldman and Patriot Exploration  
 Company, LLC

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

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

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

Plaintiff,

vs.

**UNOPPOSED MOTION TO EXTEND  
 DEADLINE TO FILE JOINT PRE-  
 TRIAL ORDER**

**(First Request)**

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

Defendants.

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

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

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.

6  
7 Plaintiff, MILLENNIUM DRILLING CO., INC. ("Millennium"), and Third-Party  
8 Defendants JONATHAN FELDMAN ("Feldman") and PATRIOT EXPLORATION  
9 COMPANY, LLC ("Patriot") (collectively, the "Millennium Parties"), by and through their  
10 counsel, hereby move the Court for an Order extending the deadline for the filing of the Pre-  
11 Trial Order. The Pre-Trial Order is currently due on February 19, 2016, and the Millennium  
12 Parties hereby request that the deadline be extended for an additional 30 days to March 21,  
2016.

13  
14 This request is made due to the shear volume of documents produced in this matter and  
15 the complex nature of the claims and defenses involved. Additional time is necessary to allow  
16 the parties to work through and determine the undisputed facts, the disputed facts and the  
17 disputed issues of law for trial. Further, additional time is necessary to work through and  
18 determine the stipulations and objections regarding potential trial exhibits. There is also good  
19 cause to extend the deadline due the upcoming Settlement Conference before Magistrate  
20 Hoffman. Per the Order Scheduling A Settlement Conference (Dkt. #230), the parties  
21 settlement statements are due on March 25. It is anticipated that the settlement statements will  
22 contain a significant amount of overlap with the Pre-Trial Order, and the extension will allow  
23 the parties to work on both submissions in a more efficient and effective manner.

24 Counsel for the Millennium Parties has consulted with counsel for the Defendants/Third  
25 Party Plaintiffs regarding the need and intention to file this motion, and counsel for  
26 Defendants/Third Party Plaintiffs affirm that they had no opposition to the motion. For that  
27 reason, this motion has been submitted as an unopposed motion.

28 ///

1 Therefore, the Millennium Parties hereby request that the deadline to file the Pre-Trial  
2 Order be continued from February 19, 2016 to March 21, 2016.

3 **DATED** this 18<sup>th</sup> day of February 2016.

4 HOWARD & HOWARD ATTORNEYS PLLC

5 /s/ Wade B. Gochmour

6 Wade B. Gochmour, Esq.

7 Nevada Bar No. 6314

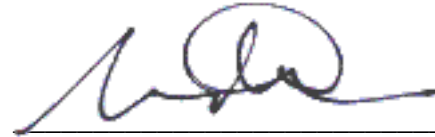
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9 Las Vegas, NV 89169

10 Attorney for Millennium Drilling Co., Inc.,

11 Jonathan Feldman and Patriot Exploration  
12 Company, LLC

13 **IT IS SO ORDERED:**

14 

15 **UNITED STATES DISTRICT COURT JUDGE**

16 **DATED:** February 22, 2016

**CERTIFICATE OF SERVICE**

I certify that on this 18<sup>th</sup> day of February 2016, and according to Fed. R. Civ. P. 5(b), I served, via CM/ECF and/or deposited for mailing in the U.S. Mail, a true and correct copy of the foregoing **UNOPPOSED MOTION TO EXTEND DEADLINE TO FILE JOINT PRE-TRIAL ORDER**, postage prepaid (if necessary) addressed to all parties identified on the Court generated Notice of Electronic Filing.

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/s/ Kellie Piet  
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4832-7166-5454, v. 1

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