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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)

**UNOPPOSED MOTION TO EXTEND
 DEADLINE TO FILE JOINT PRE-
 TRIAL ORDER FOR AN ADDITIONAL
 TWO (2) DAYS**

(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 Third-Party Defendants.

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 extended date for the filing of Pre-Trial Order is currently due March, 21,
12 2016. In order to avoid a violation of the Court’s Order, the Millennium Parties hereby request
13 that the deadline be extended for an additional **two (2)** days to March 23, 2016.

14 Counsel for Defendants/Third Party Plaintiffs was out of the office during the last week,
15 and thought that the first extension had been given to Thursday, March 24, 2016, rather than
16 Monday, March 21, 2016. Additional time is necessary to allow the parties to complete the
17 final stipulations and objections regarding potential trial exhibits.

18 As of this Second Request, the parties have exchanged exhibit lists, witness lists and
19 deposition designations. Further, a draft of the Pre-Trial Order has been exchanged and the
20 parties believe the substance of the order is acceptable. So, while the Pre-Trial Order will likely
21 be finalized and filed on Tuesday, March 22, 2016, the Millennium Parties are asking for 2
22 additional days.

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

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1 Therefore, the Millennium Parties hereby request that the deadline to file the Pre-Trial
2 Order be continued for an additional two (2) days from March 21, 2016, to March 23, 2016.

3 **DATED** this 21st day of March 2016.

4 HOWARD & HOWARD ATTORNEYS PLLC

5 /s/ Wade B. Gochnour

6 Wade B. Gochnour, Esq.

7 Nevada Bar No. 6314

8 3800 Howard Hughes Pkwy., Ste. 1000

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:**

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15 UNITED STATES DISTRICT COURT JUDGE

16 **DATED:** March 22, 2016

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

CERTIFICATE OF SERVICE

I certify that on this 21st day of March 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 FOR AN ADDITIONAL TWO (2) DAYS**, postage prepaid (if necessary) addressed to all parties identified on the Court generated Notice of Electronic Filing.

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/s/ Emily Galante
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4826-7561-9887, v. 1