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27 Company, LLC

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

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

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

5 Plaintiff,

6 vs.  
7  
8 **UNOPPOSED MOTION TO EXTEND  
9 DEADLINE TO FILE JOINT PRE-  
10 TRIAL ORDER FOR AN ADDITIONAL  
11 TWO (2) DAYS**

12  
13 **(Second Request)**

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

19 Defendants.

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

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

Third-Party Plaintiffs,

**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  
Holt, and Schain, Leifer, Guralnick,

5 Third-Party Defendants.

6 Plaintiff, MILLENNIUM DRILLING CO., INC. (“Millennium”), and Third-Party  
7 Defendants JONATHAN FELDMAN (“Feldman”) and PATRIOT EXPLORATION  
8 COMPANY, LLC (“Patriot”) (collectively, the “Millennium Parties”), by and through their  
9 counsel, hereby move the Court for an Order extending the deadline for the filing of the Pre-  
10 Trial Order. The extended date for the filing of Pre-Trial Order is currently due March, 21,  
11 2016. In order to avoid a violation of the Court’s Order, the Millennium Parties hereby request  
12 that the deadline be extended for an additional **two (2)** days to March 23, 2016.

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

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

22 Counsel for the Millennium Parties has consulted with counsel for the Defendants/Third  
23 Party Plaintiffs regarding the need and intention to file this motion, and counsel for  
24 Defendants/Third Party Plaintiffs affirm that they had no opposition to the motion. For that  
25 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 21<sup>st</sup> day of March 2016.

4 HOWARD & HOWARD ATTORNEYS PLLC

5 /s/ Wade B. Gochnour  
6 Wade B. Gochnour, Esq.  
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10 Attorney for Millennium Drilling Co., Inc.,  
11 Jonathan Feldman and Patriot Exploration  
12 Company, LLC

13 **IT IS SO ORDERED:**



14 **UNITED STATES DISTRICT COURT JUDGE**

15 **DATED:** March 22, 2016

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(702) 257-1483

**CERTIFICATE OF SERVICE**

I certify that on this 21<sup>st</sup> 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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4826-7561-9887, v. 1