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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 THE ERECTION COMPANY, INC., a
 Washington Corporation

11 Plaintiff,

12 vs.

13 ARCHER WESTERN CONTRACTORS,
 LLC, a Delaware foreign limited-liability
 14 company; POSTEL ERECTION GROUP,
 LLC, a domestic limited liability company;
 15 POSTEL WEST, INC., an Arizona
 corporation; POSTEL INDUSTRIES, INC., an
 16 unknown entity; TRAVELERS CASUALTY
 AND SURETY COMPANY OF AMERICA;
 17 DOES I through X; ROES XI through XX

18 Defendants.

CASE NO. 2:12-cv-00612-MMD-NJK

19 **JOINT MOTION AND
 ORDER FOR AN EXTENSION OF TIME
 FOR THE PARTIES TO FILE A JOINT
 PRETRIAL ORDER WITH THE COURT**

(Second Request)

20 AND RELATED ACTIONS

21
 22 Plaintiff, The Erection Company (“TEC), and Defendants, Archer Western Contractors, LLC
 23 (“AWC”), Travelers Casualty and Surety Company of America (“Travelers”) and Postel Industries,
 24 Inc., (“Postel”), by and through their counsel of record, hereby jointly move for an Order extending
 25 the deadline in which the parties have to file a Joint Pretrial Order with the Court. Pursuant to the
 26 Court’s Minute Order filed March 19, 2015, the Court ordered that the parties file a Joint Pretrial
 27 Order with the Court. (See Dkt. #245.) The parties hereto request a further thirty day extension of that
 28

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1 deadline to July 7, 2015 for the following reasons: (1) The parties have found it impossible to schedule
2 a meeting of counsel to discuss the stipulated facts, stipulated documents, objections to documents and
3 deposition testimony, etc required by the Joint Pre Trial Order because of previously scheduled
4 vacations and calendar conflicts; (2) The sheer volume of potential trial documents and deposition
5 testimony warrants an exchange of proposed exhibits, facts, issues of law, and deposition testimony
6 prior to any meeting of counsel. The brief extension of the deadline to file the pre trial order will allow
7 the parties to exchange such documents, briefs and evidence; and (3) The parties intend to discuss
8 during the brief extension whether to exclude the respective sureties from the trial pursuant to a
9 stipulation, thereby streamlining the trial herein. Consequently, the parties jointly request an Order from
10 the Court extending the deadline in which the parties have to file their Joint Pretrial Order from June
11 5, 2015 until July 7, 2015.

12 DATED this 21st day of May, 2015.

13 THE FAUX LAW GROUP

KEMP, JONES & COULTHARD, LLP

14 /s/ Kurt C. Faux, Esq.

/s/ Spencer H. Gunnerson, Esq. (by permission)

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22 and Travelers Surety and Casualty Company of

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25 /s/ Steve M. Williard, Esq. (by permission)

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(Bond No. 105707041)

1 The Erection Company, Inc. v. Archer Western Contractors, LLC, et al.
2 United States District Court, District Of Nevada Case No. 2:12-cv-00612-MMD-NJK
3 Joint Motion and Proposed Order for an Extension of Time for the
4 Parties to File a Joint Pretrial Order with the Court (Second Request)

5 ORDER

6 IT IS SO ORDERED:

7 

8 United States District Court Judge

9 DATED: May 26, 2015