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7 **UNITED STATES DISTRICT COURT**
 8 **DISTRICT OF NEVADA**

9 THE ERECTION COMPANY, INC., a
 Washington Corporation

10 Plaintiff,

11 vs.

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

17 Defendants.

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

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

(Fourth Request)

18 **AND RELATED ACTIONS**
 19

20
 21 Plaintiff, The Erection Company (“TEC), and Defendants, Archer Western Contractors, LLC
 22 (“AWC”), Travelers Casualty and Surety Company of America (“Travelers”) and Postel Industries,
 23 Inc., (“Postel”), by and through their counsel of record, hereby jointly move for an Order extending
 24 the deadline in which the parties have to file a Joint Pretrial Order with the Court. Pursuant to the
 25 Court’s Order filed July 2, 2015, the Court ordered that the parties file a Joint Pretrial Order with the
 26 Court. (*See* Dkt. #250). The parties have previously exchanged draft pretrial orders, but request further
 27 extension of the Joint Pretrial Order deadline to August 6, 2015 for the following reasons: (1)
 28 Plaintiff’s lead counsel will be out of the office for a period of time due to the birth of his child; (2) in

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1 anticipation of the meeting between counsel, TEC, AWC, and Travelers have exchanged initial drafts
2 of the Joint Pretrial Order, but additional time is required for TEC's, AWC's, Travelers', and Postel's
3 counsel to meet and discuss the contents of the Joint Pretrial Order; (3) to afford the Court the
4 opportunity to decide AWC's Motion to Stay (Dkt #248), though the filing of the pretrial orders is not
5 dependent on a decision on AWC's Motion to Stay; and (4) the parties are still having discussions
6 whether to exclude the respective sureties from the trial pursuant to a stipulation, thereby streamlining
7 the trial herein. The brief extension of the deadline to file the pretrial order will allow the parties to
8 review the proposed drafts, discuss stipulations, and hold a meaningful meet and confer on the Joint
9 Pretrial Order. Consequently, the parties jointly request an Order from the Court extending the
10 deadline in which the parties have to file their Joint Pretrial Order from July 21, 2015 until August 6,
11 2015.

12 DATED this 16th day of July, 2015.

13 THE FAUX LAW GROUP

KEMP, JONES & COULTHARD, LLP

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

ORDER

IT IS SO ORDERED:



United States District Court Judge

DATED: __ July 20, 2015 _____