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10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

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13 Trustees of the Plumbers and Pipefitters Union  
 14 Local 525 Health and Welfare Trust and Plan;  
 15 Trustees of the Plumbers and Pipefitters Union  
 16 Local 525 Pension Plan; and the Trustees of the  
 17 Plumbers and Pipefitters Local Union 525  
 18 Apprentice and Journeyman Training Trust for  
 19 Southern Nevada,

20 Plaintiffs

21 vs.

22 Juan Carrilio Sotelo dba Sotelo Air; Sotelo Air,  
 23 Inc., dba Cool Air Now; Aegis Security Insurance  
 24 Company, a Pennsylvania corporation; American  
 25 Safety Casualty Insurance Company, a Georgia  
 26 corporation,

27 Defendants.

28 Trustees of the Plumbers and Pipefitters National  
 Pension Fund and International Training Fund,  
 Plaintiffs,

vs.

Juan Carrilio Sotelo dba Sotelo Air; Sotelo Air,  
 Inc. dba Cool Air Now; Juan Carrilio Sotelo,  
 an individual; Now Services of Nevada, LLC dba  
 Cool Air Now, a Nevada limited liability  
 company; Now Services of Nevada, LLC dba  
 Plumbing Repair Now, a Nevada limited liability  
 company; Western National Mutual Insurance  
 Company, a surety company; John Does I-X and  
 Roe Corporations I-X, inclusive,

Defendants.

Case No.: 2:13-CV-00657-RFB-NJK

**CONSOLIDATED WITH:**

Case No.: 2:14-cv-01609-JAD-CWH

**STIPULATION TO EXTEND TIME**  
**TO RESPOND TO DEFENDANTS'**  
**FRCP 12(B)(6) MOTION TO DISMISS**  
**PLAINTIFFS' AMENDED**  
**COMPLAINT**

**(FIRST REQUEST)**

Date: N/A

Time: N/A

1 The Plaintiffs, Plumbers and Pipefitters National Pension Fund and International Training  
2 Fund (“National Funds”), by and through their Counsel, Christensen James & Martin and  
3 Defendants Juan Carrillo Sotelo dba Sotelo Air, Sotelo Air, Inc. dba Cool Air Now and Juan  
4 Carrillo Sotelo (“Defendants”) by and through their Counsel, Law Offices of Michael F. Bohn,  
5 Esq., Ltd., hereby Agree and Stipulate that the National Funds shall have through and including  
6 Tuesday, October 27, 2015, to file and serve its Responsive Pleading to Defendants’ FRCP  
7 12(b)(6) Motion to Dismiss Plaintiffs’ Amended Complaint (Doc. 85) on file herein. This  
8 Stipulation is entered at the request of Counsel for the National Funds, and is not entered for the  
9 purpose of causing unnecessary delay, but rather is made necessary to allow the National Funds  
10 additional time to analyze the Motion and prepare a Response.  
11

12 Christensen James & Martin

Law Offices of Michael F. Bohn, Esq., Ltd.

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14 By: /s/ Laura J. Wolff  
15 Laura J. Wolff, Esq.  
16 Attorneys for National Funds

By: /s/ Michael F. Bohn  
Michael F. Bohn, Esq.  
Attorneys for Defendants

17 Dated: October 21, 2015.

Dated: October 21, 2015.

18 **IT IS SO ORDERED.**

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21 RICHARD F. BOULWARE, II  
22 United States District Judge

23 Dated: October 26, 2015.  
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