

1 **BRUNO TARABICHI**, CA State Bar No. 215129
 2 bruno@tmwlawfirm.com
 3 **TMW LAW**
 4 4750 Almaden Expy 124-359
 5 San Jose, California 95118
 6 Telephone: 408.634.0324
 7 Facsimile: 408.715.6707
 8 *Pro Hac Vice*

9 **PUOY K. PREMSRIRUT**, State Bar No. 7141
 10 puoy@brownlawlv.com
 11 **PUOY K. PREMSRIRUT, ESQ. INC.**
 12 520 S. Fourth Street, Second Floor
 13 Las Vegas, NV 89101
 14 Telephone: 702.384.5563
 15 Facsimile: 702.385.1752

16 Attorneys for Plaintiff
 17 Russell Road Food and Beverage, LLC

18 UNITED STATES DISTRICT COURT
 19 DISTRICT OF NEVADA
 20 SOUTHERN DIVISION

21 RUSSELL ROAD FOOD AND
 22 BEVERAGE, LLC,

23 Plaintiff,

24 vs.

25 MIKE GALAM, et al.

26 Defendants.

27 MIKE GALAM, et al.,

28 Counterclaimants,

vs.

RUSSELL ROAD FOOD AND
 BEVERAGE, LLC, et al.

Counterdefendant.

Case No. 2:13-cv-00776-RFB-NJK

**STIPULATED REQUEST FOR ADDITIONAL
 TIME TO SUBMIT PROPOSED JOINT
 DISCOVERY AND SCHEDULING ORDER**

Case Filed: May 2, 2013

Judge: Honorable Richard F. Boulware

1 On February 28, 2018, this Court held a hearing on the following motions:

- 2 • Defendants Mike Galam, Victor Galam, Jacqueline Galam Barnes, Crazy
3 Horse Too Gentlemen’s Club LLC, Rhino Bare Projects LLC, and Rhino
4 Bare Projects 4824 LLC’s (the “Galam Defendants”) Motion for
5 Reconsideration (ECF No. 336);
- 6 • Defendants Canico Capital Group, LLC and Industrial Road 2440-2497,
7 LLC’s (the “Canico Defendants”) and Defendants Abraham Assil, George
8 Eshaghian, West Best Capital Group, LLC, SN & GE, LLC, and Soleiman
9 Nazarian’s (the “Assil Defendants”) Motion for Reconsideration (ECF No.
10 337);
- 11 • Defendants Djavid Hakakian, Morris Nejathaim, Hamed Yazdanpanah,
12 Isaac Javdanfar, Kamran Samooha, Mehran Sadighpour, Sefox
13 Investment, LLC, El Marino, LLC, Knotting Hill, LLC, IJ Properties, LLC, and
14 S Double, LLC’s (the “Hakakian Defendants”) Motion for Reconsideration
15 (ECF No. 339);
- 16 • Plaintiff Russell Road Food and Beverage, LLC’s (“Russell Road”) Cross-
17 Motions for Summary Judgment against the Galam Defendants, Canico
18 Defendants, Assil Defendants, and Hakakian Defendants (ECF Nos. 346,
19 348, and 351); and
- 20 • Plaintiff Russell Road’s Motion for Preliminary Injunction (ECF No. 361).

21 At the hearing, the Court took the motions under submission and ordered the parties to
22 submit a proposed joint discovery and scheduling order.

23 On March 12, 2018, the Court issued a Minute Order providing as follows:

24 IT IS ORDERED that the parties shall submit a Joint
25 Proposed Discovery/Scheduling Order for this Court’s
26 consideration due by two weeks. The Scheduling Order
27 should include six to nine months of discovery with a motion
28 calendar as it relates to dispositive motions regarding the
issue of personal liability which can address the period of
infringement and damages. IT IS FURTHER ORDERED that
the parties are directed to electronically file in CM/ECF, a
joint letter for this Court’s consideration regarding any

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

disputed discovery issues. The parties are then directed to notify the courtroom deputy as to scheduling a status conference hearing.

ECF No. 373. Pursuant to the Court’s Minute Order, the Joint Proposed Discovery and Scheduling Order was due on March 14, 2018.

At present, the parties are unable to agree on the language of a Joint Proposed Discovery and Scheduling Order and are in the process of attempting to negotiate mutually acceptable language. The parties respectfully request additional time to submit the Joint Proposed Discovery and Scheduling Order.

The parties propose that they be given until April 3, 2018 to submit a Joint Proposed Discovery and Scheduling Order and that, if the parties are unable to reach agreement on a Joint Proposed Discovery and Scheduling Order by April 3, 2018, the parties shall each submit their own proposed Discovery and Scheduling Order by April 6, 2018 for the Court’s consideration.

IT IS SO STIPULATED

Dated: March 26, 2018

Respectfully submitted,
TMW LAW

By /s/ Bruno Tarabichi
Bruno Tarabichi
Attorneys for Plaintiff
Russell Road Food and Beverage, LLC

1 Dated: March 26, 2018

Respectfully submitted,

2

LAMBROSE BROWN PLLC

3

4

By /s/ William Brown

5

William Brown

6

Attorneys for Defendants Mike Galam,
Crazy Horse Too Gentlemen's Club LLC,
Victor Galam, Jacqueline Galam Barnes,
Rhino Bare Projects LLC, and Rhino Bare
Projects 4824 LLC

7

8

9 Dated: March 26, 2018

Respectfully submitted,

10

AKERMAN LLP

11

12

By /s/ Ariel E. Stern

13

Ariel E. Stern

14

Attorneys for Defendants Canico Capital
Group, LLC, Industrial Road 2440-2497,
LLC, Abraham Assil, George Eshaghian,
West Best Capital Group, LLC, SN & GE,
LLC, and Soleiman Nazarian

15

16

17

18 Dated: March 26, 2018

Respectfully submitted,

19

LEBEDEV, MICHAEL & HELMI

20

21

By /s/ Gennady L. Lebedev

22

Gennady L. Lebedev

23

Attorneys for Defendants Djavid
Hakakian, Morris Nejathaim, Hamed
Yazdanpanah, Isaac Javdanfar, Kamran
Samooaha, Mehran Sadighpour, Sefox
Investment, LLC, El Marino, LLC,
Knotting Hill, LLC, IJ Properties, LLC, and
S Double, LLC

24

25

26

27

28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

IT IS SO ORDERED:



HON. RICHARD F. BOULWARE
UNITED STATES DISTRICT JUDGE

DATED: March 28, 2018.