

1 DANIEL W. GLASSER, ESQ.  
Nevada Bar No. 6990  
2 CHIPMAN GLASSER, LLC.  
2000 S. Colorado Blvd.  
3 Tower One, Suite 7500  
Denver, CO 80222  
4 Telephone No.: (303) 578-5780  
Facsimile No.: (303) 578-5790  
5 dglasser@chipmanglasser.com

6 *Attorney for Helen Tang*

7 UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

8 SECURITIES AND EXCHANGE  
9 COMMISSION,

Plaintiff,

10 vs.

11 EDWIN YOSHIHIRO FUJINAGA; and  
12 MRI INTERNATIONAL, INC.,

Defendants,

13 and

14 CSA SERVICE CENTER, LLC;  
15 THE FACTORING COMPANY;  
JUNE FUJINAGA; and  
16 THE YUNJU TRUST,

Relief Defendants.

Case No.: 2:13-cv-01658-JCM-CWH

**AMENDED STIPULATION AND  
ORDER TO EXTEND HELEN  
TANG'S DEADLINE TO FILE A  
RESPONSE TO THE RECEIVER'S  
MOTION**

(FIRST REQUEST)

17  
18 Helen Tang ("Ms. Tang"), by and through her counsel Daniel W. Glasser of the law firm  
19 of Chipman Glasser, LLC on the one hand, and Robb Evans & Associates LLC, as receiver (the  
20 "Receiver") by and through its counsel, Michael F. Lynch of the Lynch Law Practice, PLLC on  
21 the other hand, hereby stipulate to the following:

22 1. That the Receiver filed its *Motion for Order Authorizing, Directing, and*  
23 *Requiring Rabobank, N.A. and Helen Tang to Immediately Turn Over to the Receiver All*  
24 *Proceeds from the Sale of One Stop Pharmacy*, on December 20, 2017 (ECF No. 464) (the  
25 "Motion"). The Receiver filed and served upon Ms. Tang by mail, its Notice of Motion and  
26 Opportunity to Object on December 21, 2017. (ECF Nos. 466, 468);

27 2. That Ms. Tang's response to the Motion was due January 8, 2018. (Fed. R. Civ. P.  
28 6(d) and LR 7-2);

1           3.       That the parties' original Stipulation and Order filed January 8, 2018 (ECF  
2 No. 472) mistakenly proposed the court holiday January 15 as the deadline, and thus the parties  
3 hereby submit this Amended Stipulation and Order stipulating to a January 16, 2018 deadline;

4           4.       That Ms. Tang requires additional time beyond the original deadline in light of the  
5 following: (a) the Receiver's Motion was filed just before the year-end holidays, during which  
6 time the undersigned attorneys' and their staffs' regular work schedules were altered and reduced  
7 in advance where feasible, (b) Ms. Tang expended reasonable efforts to retain counsel and  
8 retained Mr. Glasser on January 5, 2018, and (c) Mr. Glasser has thereby had insufficient time to  
9 become fully familiar with the issues raised in the Motion and prepare a substantive response;

10          5.       That it is appropriate under the circumstances to allow Ms. Tang's above-  
11 referenced counsel up to and including Tuesday, January 16, 2018 to file a response to the  
12 Motion on behalf of Ms. Tang; and

13          6.       That, subject to entry of the order proposed below, the deadline to respond to the  
14 Receiver's Motion shall be extended for Ms. Tang only, as follows:

	<u>Current Deadline</u>	<u>Proposed Deadline</u>
Ms. Tang's deadline to file a response to the Receiver's Motion	01/08/2018	01/16/2018

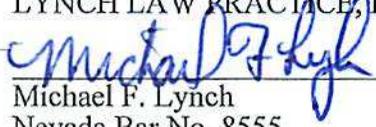
15  
16  
17  
18           DATED January 11, 2018.

19           CHIPMAN GLASSER, LLC

20  
21           DANIEL W. GLASSER, ESQ.  
22           Nevada Bar No. 6990  
23           2000 S. Colorado Blvd.  
24           Tower One, Suite 7500  
25           Denver, CO 80222  
26           Telephone No.: (303) 578-5780  
27           Facsimile No.: (303) 578-5790  
28           dglasser@chipmanglasser.com

*Attorney for Helen Tang*

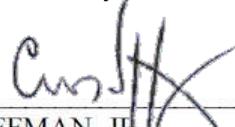
LYNCH LAW PRACTICE, PLLC

  
Michael F. Lynch  
Nevada Bar No. 8555  
3613 S. Eastern Ave.  
Las Vegas, Nevada 89169  
702.684.6000  
702.413.8282 (direct)  
702.543.3279 (fax)  
Michael@LynchLawPractice.com

*Attorney for the Receiver  
Robb Evans & Associates LLC*

IT IS SO ORDERED.

DATED: January 12, 2018

  
C.W. HOFFMAN, JR.  
UNITED STATES MAGISTRATE JUDGE

This order  
supersedes the  
parties' stipulation  
at #472, which is  
hereby DENIED as  
MOOT.