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8 UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA  
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10 UNITED STATES FOR THE USE AND  
BENEFIT OF AGATE STEEL, INC.;  
11 AGATE STEEL, INC., an Arizona  
Corporation,

12 Plaintiffs,

13 vs.

14 JAYNES CORPORATION, a New Mexico  
corporation; WESTERN SURETY  
15 COMPANY, South Dakota corporation,

16 Defendants.

CASE NO. 2:13-cv-01907-APG-NJK

**NOTICE OF STIPULATED MOTION  
AND ~~PROPOSED~~ ORDER FOR  
EXTENSION TO RESPOND TO  
COMPLAINT**

**(SECOND REQUEST)**

17 Plaintiffs United States for the Use and Benefit of Agate Steel, Inc. and Agate Steel, Inc.  
18 (“Plaintiffs”) and Defendant Jaynes Corporation (“Jaynes”), by and through their respective  
19 counsel, hereby move by stipulation, to extend the deadline for Jaynes to respond to Plaintiffs’  
20 Complaint filed on October 17, 2013 [Doc. No. 1] from December 3, 2013 to December 12, 2013.

21 Pursuant to Fed. R. Civ. P. 6(b)(1) and Local Rule 6-1, there exists good cause to grant  
22 this extension to respond for the following reasons.

- 23 1. Jaynes was served with the Summons and Complaint on November 13, 2013  
24 [Doc. No. 7].
- 25 2. Due to various internal matters to be resolved, counsel for Jaynes Corporation was  
26 just recently retained, and requires additional time to prepare its response.
- 27 3. Additionally, the Thanksgiving holiday limited the number of days available for  
28 counsel to prepare a response.

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- 4. On November 26, 2013, the parties agreed to the extension requested herein.
- 5. This same extension request was originally submitted via stipulation and order on November 27, but rejected for failure to comply with Fed. R. Civ. P. 6(b)(1).
- 6. This stipulated extension request is sought in good faith and is not made for the purpose of delay.
- 7. This Notice of Stipulated Motion and Proposed Order for Extension to Respond to Complaint is submitted before the current December 3 deadline to respond.

Therefore, the parties jointly request that Jaynes' deadline to respond to Plaintiffs' Complaint be extended until December 12, 2013.

Respectfully submitted,

Dated: December 2, 2013

Dated: December 2, 2013

LAW OFFICES OF TIMOTHY D. DUCAR,  
PLC

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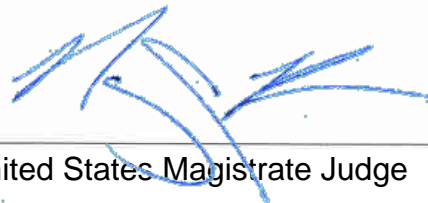
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ORDER

IT IS HEREBY ORDERED that the deadline for Jaynes Corporation to respond to Plaintiffs' Complaint filed on October 17, 2013 [Doc. No. 1] is extended to December 12, 2013.

DATED this 2nd day of December, 2013.



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United States Magistrate Judge