

LAW OFFICE OF  
**HAYES & WELSH**  
A PROFESSIONAL CORPORATION  
199 NORTH ARROYO GRANDE BLVD., SUITE 200  
HENDERSON, NEVADA 89074  
(702) 434-3444 FAX (702) 434-3739

1 LARSON A. WELSH, ESQ.  
Nevada Bar No. 12517  
2 LAW OFFICE OF HAYES & WELSH  
199 North Arroyo Grande Blvd., Suite 200  
3 Henderson, Nevada 89074  
Phone: 702-434-3444  
4 Fax: 702-434-3739  
Email: Lwelsh@lvlaw.com  
5 *Attorneys for Nonparties Vinum, Inc.,  
Caymus Limited Partnership, Ecommerce  
6 Marketing, Inc., T-3 Media, LLC, Wild West  
Media, LLC, Pacific Coastal, LLC, and  
7 Consumercoupons.com, Inc.*

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

10 GENX PROCESSORS MAURITIUS  
11 LIMITED,

12 Plaintiff,

13 v.

14 MATTHEW G. JACKSON a/k/a MATT G.  
15 JACKSON; SYMMETRIC SYSTEMS, LLC;  
16 SYMMETRIC SYSTEMS, INC. f/k/a  
17 SYMMETRIC SYSTEMS, LLC; and DOES I  
through X,

18 Defendants.  
19

Case No. 2:14-cv-01938-APG-PAL

**STIPULATION AND ORDER TO  
EXTEND SHOW CAUSE HEARING  
(First Joint Request to Extend Show  
Cause Hearing)<sup>1</sup>**

20 Nonparties Vinum, Inc., Caymus Limited Partnership, Ecommerce Marketing, Inc., T-3  
21 Media, LLC, Wild West Media, LLC, Pacific Coastal, LLC, and Consumercoupons.com, Inc.  
22 (collectively referred to as “Nonparties”), by and through their attorney, the Law Office of Hayes  
23 & Welsh, and Plaintiff, GenX Processors Mauritius Limited (“Plaintiff” and collectively with  
24 Nonparties, the “Parties”), by and through its attorney of record, The Dean Legal Group, Ltd.,  
25 hereby submit this Stipulation and Order to Extend Show Cause Hearing. The Show Cause  
26 Hearing is presently scheduled to occur on February 5, 2019 at 10:30 a.m. ECF No. 76.

27 ...

28 <sup>1</sup> For purposes of clarity, Nonparties previously requested to continue the Show Cause Hearing on an Emergency Basis. ECF No. 75. Nonparties’ Emergency Motion (ECF No. 75) was granted and the Show Cause Hearing was moved from January 8, 2019 to the presently scheduled date of February 5, 2019. See ECF No. 76.

1 This Stipulation and Order is submitted in compliance with LR IA 6-1, LR IA 6-2 and  
2 LR 26-4. As the present request to extend a deadline is made within 21 days before the Show  
3 Cause Hearing, the Parties submit that the following constitutes a showing of good cause. *See*  
4 LR 26-4.

5 On December 18, 2018, the Court set a Hearing on Plaintiff's Motion for Order to Show  
6 Cause (ECF No. 65). The Hearing was set for January 8, 2019 at 10:30 a.m. and required the  
7 personal appearance of Nonparties' representative Matthew G. Jackson. ECF No. 74.

8 On January 2, 2019, Nonparties filed an Emergency Motion to Continue the Show Cause  
9 Hearing based on personal circumstances of Nonparties' representative Matthew G. Jackson.  
10 (ECF No. 75). In their Emergency Motion to Continue, the Nonparties also stated the following:

11 Further, granting a continuance until February 5, 2019, would allow an  
12 opportunity for Nonparties to accept one of Plaintiff's offer and provide  
13 Nonparties an opportunity to perform on the first of two settlement payments to  
14 Plaintiff. A step, which if achieved, would bring this matter one final payment  
away from a full and complete resolution.

15 *See e.g., id.* at p. 8, lln. 8-11.

16 As contemplated in the Emergency Motion to Continue, the Parties subsequently entered  
17 into a Mutual Release and Settlement Agreement ("Settlement Agreement"). The terms of the  
18 Settlement Agreement are confidential, but the Parties submit that Nonparties have performed  
19 on the first of two settlement payments to Plaintiff. Accordingly, the Parties respectfully request  
20 this Court continue the Show Cause Hearing currently scheduled for February 5, 2019 (ECF No.  
21 76) until a date after March 8, 2019. If Nonparties perform on the second and final payment to  
22 Plaintiff, a satisfaction of judgment will be filed, ending this controversy in its entirety, including  
23 the need to hold a show cause hearing. If Nonparties fail to perform on the second and final  
24 payment to Plaintiff, Nonparties will have presumably breached the confidential settlement  
agreement and the post-March 8, 2019 Show Cause Hearing will move forward.

25 The Parties submit this stipulation and order diminishes the likelihood for further judicial  
26 intervention in this matter. Further this stipulation and order minimizes the use of judicial  
27 resources, as well as the resources of the Parties.

28 ...

1 Dated this 31<sup>st</sup> day of January 2019

Dated this 31<sup>st</sup> day of January 2019

2 THE LAW OFFICE OF HAYES & WELSH

THE DEAN LEGAL GROUP, LTD.

3 By: /s/ Larson A. Welsh

By: /s/ Aaron R. Dean

4 LARSON A. WELSH, ESQ.

AARON R. DEAN, ESQ.

5 Nevada Bar No. 12517

Nevada Bar No. 9541

6 199 North Arroyo Grande Blvd., Suite 200

721 S. 6<sup>TH</sup> Street

7 Henderson, Nevada 89074

Las Vegas, Nevada 89101

8 Tel: (702) 434-3444

Tel: (702) 823-1354

9 Fax: (702) 434-3739

Fax: (702) 823-2368

10 *Attorneys for Nonparties Vinum, Inc.,*  
11 *Caymus Limited Partnership, Ecommerce*  
12 *Marketing, Inc., T-3 Media, LLC, Wild*  
13 *West Media, LLC, Pacific Coastal, LLC,*  
14 *And Consumercoupons.com, Inc.*

*Attorneys for Plaintiff*

15 **IT IS SO ORDERED** that the Order to Show Cause Hearing currently set for  
16 February 5, 2019, is **VACATED** and **CONTINUED** to March 12, 2019 at 11:30 a.m.  
17 in Courtroom 3B.

18 

UNITED STATES MAGISTRATE JUDGE

19 DATED: February 1, 2019