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Wing Yam Wong, Essi, (NV Bar No. 13622) GORDON & REESI LJ B 300 South Fourth Street, Suite 1550 3 Las Vegas. Nevada 89169 Telephone: (702) 577-9301 Facsimile: (702) 552-5858 france gendonces.com Wwong @gordonces.com Wwong @gordonces.com New York. New York 10036 United States Telephone: (212) 378-7535 Facsimile: (212) 505-3950 natritzer@steptoe.com 11 Attorneys for Defendants Avison Young (Canada) Inc., Avison Young (USA) Inc., Avison Young, Varian Yung, Yang Yung, Yang Yung, Yang Yung, Yang Yung, Yang Yung, Yang						
2       GORDON KRES LLP 300 South Fourth Street, Suite 1550         3       Las Vegas, Nevada 89169         7       Harscniff gordonrees.com         9       Pacsimile: (702) 255-2858         1       Rankaniel Kritzer (admitted pro hac vice)         5       STEPTOE & JOHNSON LLP         7       1440 Avenue of the Americas New York, New York 10036         9       Facsimile: (212) 378-7535         9       Facsimile: (212) 378-7536         9       Facsimile: (212) 378-7537         9       Facsimile: (212) 378-7537         9       Facsimile:		1				
3       Las Vegas, Nevada 89169 Telephone: (702) 255-2858 Harssen@ gordonces.com         4       Facsimile: (702) 255-2858 Harssen@ gordonces.com         5       Wwong@gordonces.com         6       Nathaniel Kritzer (admitted pro hac vice) STEPTOR & JOHNSON LLP         7       1440 Avenue of the Americas New York, New York (10036         8       United States Telephone: (212) 306-3950 Intritzer@steptoe.com         10       Attorneys for Defendants Avison Young (Canada) Inc., Avison Young (USA) Inc., Avison Young, Nevada, LLC, Mark Rose, Joseph Kupiec, The Nevada Commercial Group, and John Pinjux         11       UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA         16       NEWMARK GROUP, INC., G&E ACQUISITION NEVADA, LLC, and BGC REAL ESTATE OF NEVADA, LLC, MARK ROSE, TO PLAINTIFES' MOTON FOR POSTOR 101       CASE NO: 2:15-ev-00531-RFB-EJY STIPULATION AND ORDER TO ESTIPULATION AND ORDER TO ESTIPULATION AND ORDER TO ESTIPULATION AND ORDER TO ESTIPULATION AND ORDER TO ERSPONSE TO PLAINTIFES' MOTON FOR NEVADA, LLC, MARK ROSE, THE NEVADA COMMERCIAL GROUP, JOHN FINJUY, and JOSEFIT KUPIEC: DOES I through 10       STIPULATION NECF. NO. 476] AND OBJECTION TO RECOMMENDATION [ECF. NO. 476] AND OBJECTION TO RECOMENDATION [ECF. NO. 476] AND OBJECTION TO AND AND AND		2	GORDON & REES LLP			
4       Facsimile: (702) 255-2858         1       Hassen@gordonrees.com         5       Wwong @gordonrees.com         6       Nathaniel Kritzer (sdmitted pro hac vice)         5       STEPTOR & JOHNSON LUP         7       1440 Avenue of the Americas         New York, New York 10036       United States         10       Attorneys for Defendants         Avison Young (Canada) Inc., Avison Young       (USA) Inc., Avison Young         11       Avison Young (Canada) Inc., Avison Young         12       (USA) Inc., Avison Young, Nevada, I.I.C.         13       Mark Rose, Joseph Kapiec, The Nevada         14       UNITED STATES DISTRICT COURT         15       NEWMARK GROUP, INC., G&E ACQUISITION         16       NEWMARK GROUP, INC., G&E ACQUISITION         17       NEWADA, LLC, and BGC REAL ESTATE OF         18       NEVADA, LLC, ANARK NOSE, THE NEVADA         19       AVISON YOUNG (CANADA) INC.; AVISON         20       AVISON YOUNG (CANADA) INC.; AVISON         21       NEVADA, LLC, MARK ROSE, THE NEVADA         22       AVISON YOUNG (CANADA) INC.; AVISON         23       NECOMMERCIAL GROUP, JOHN PINJUV, and         24       JOSEPH KUPILC; DOES I through 5; and ROE         25       INDERSTRI		3	Las Vegas, Nevada 89169			
Simple Section 1         Nathaniel Kritzer (admitted pro hac vice)         STEPTOE & JOHNSON LLP         1440 Avenue of the Americas         New York, New York 10036         United States         Telephone: (212) 378-7335         Facsimit: (212) 378-7335         Integration 1         Attorneys for Defendants         Avison Young (Canada) Inc., Avison Young         (USA) Inc., Avison Young, Comada, LLC,         Mark Rose, Joseph Kupiec, The Nevada         Commercial Group, and John Pinjav         Interpret Network (ROUP, INC., G&E ACQUISITION COMPANY, LLC, and BGC REAL ESTATE OF NEVADA         NEWAAK, GROUP, INC., G&E ACQUISITION COMPANY, LLC, and BGC REAL ESTATE OF NEVADA, LLC,         NewADA, LLC,         NEVADA, LLC, Mark ROSE, THE NEVADA COMPANY NOUNG (CANADA) INC.; AVISON YOUNG - NECOMMENDATION IECF. NO.         YOUNG (USA) INC.; AVISON YOUNG - NEFORT TO PLAINTIFFS' MOTION FOR NECOMMERCIAL GROUP, JOHN PINJUV, and JOSEPH KUPIEC; DOES 1 through 5; and ROE JOHN PINJUV, and JOSEPH KUPIEC; DOES 1 through 5; and ROE JOHN FINITIES 6 through 10 JOSEPH KUPIEC; DOES 1 through 5; and ROE JOHN FINITIES 6 through 10 JOHNECK ACCOMPANCE (COMPANCE)		4	Facsimile: (702) 255-2858			
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7       1440 Avenue of the Americas Telephone: (212) 378-7535 Facsimil: (212) 506-3950 nkritzer@steptoe.com         10       Attorneys for Defendants Avison Young (Canada) Inc., Avison Young (2000, 20000, 2000, 2000, 2000, 2000, 2000, 2000, 2000, 2000, 20		6				
41       United States         9       Facsimile: (212) 378-7535         Facsimile: (212) 378-7535       Facsimile: (212) 378-7535         Facsimile: (2004)       Facsimile: (2005)         Facsimile: (212) 378-7535       Facsimile: (212) 378-7535         Facsimile: (212) 378-7535       Facsimile: (212) 378-7535         Facsimile: (212) 47       INTED STATES DISTRICT COURT         Facsimile: (212) 47       Facsimile: (212) 47         Facsimile: (2005) 47       Facsimile: (212) 47		7	1440 Avenue of the Americas			
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910COMPANY, LLC, and BGC REAL ESTATE OF NEVADA, LLC,) STIPULATION AND ORDER TO EXTEND TIME TO FILE RESPONSE TO PLAINTIFFS' MOTION FOR RECONSIDERATION [ECF. NO. 476] AND OBJECTION TO YOUNG (USA) INC.; AVISON YOUNG - NEVADA, LLC, MARK ROSE, THE NEVADA COMMERCIAL GROUP, JOHN PINJUV, and JOSEPH KUPIEC; DOES 1 through 5; and ROE BUSINESS ENTITIES 6 through 10) STIPULATION AND ORDER TO EXTEND TIME TO FILE RESPONSE TO PLAINTIFFS' MOTION FOR RECONSIDERATION [ECF. NO. 476] AND OBJECTION TO RECOMMENDATION [ECF. NO. 478] (First Request)21AVISON YOUNG (CANADA) INC.; AVISON YOUNG (USA) INC.; AVISON YOUNG - NEVADA, LLC, MARK ROSE, THE NEVADA COMMERCIAL GROUP, JOHN PINJUV, and JOSEPH KUPIEC; DOES 1 through 5; and ROE BUSINESS ENTITIES 6 through 10) (First Request)23		11				
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18       (MOTION FOR RECONSIDERATION [ECF. NO. 476] AND OBJECTION TO YOUNG (USA) INC.; AVISON YOUNG - NEVADA, LLC, MARK ROSE, THE NEVADA COMMERCIAL GROUP, JOHN PINJUV, and JOSEPH KUPIEC; DOES 1 through 5; and ROE BUSINESS ENTITIES 6 through 10       (First Request)         23	Gor	17	NEVADA, LLC,			
13       476] AND OBJECTION TO         20       AVISON YOUNG (CANADA) INC.; AVISON         21       NEVADA, LLC, MARK ROSE, THE NEVADA         22       JOSEPH KUPIEC; DOES 1 through 5; and ROE         31       JOSEPH KUPIEC; DOES 1 through 5; and ROE         32		18				
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Pursuant to Local Rules IA 6-1, IA 6-2, and LR 7-1, Plaintiffs Newmark Group, Inc. G&E Acquisition Company, LLC, and BGC Real Estate of Nevada, LLC ("Plaintiffs") and Defendants Avison Young (Canada) Inc., Avison Young (USA) Inc., Avison Young – Nevada, LLC, Mark Rose, The Nevada Commercial Group, John Pinjuv, and Joseph Kupiec ("Defendants"), by and through their respective attorneys of record, stipulate as follows:

1. This is the first stipulation for extension of time for Defendants to respond to Plaintiffs' Motion (1) to Reconsider the Court's Ruling on Defendants' Motion to Dismiss the Second Amended Complaint and (2) For Leave to File Plaintiffs' Third Amended Complaint (ECF No. 476) (the "Motion") and Plaintiffs' Objection to July 28, 2021, Finding and Recommendation Regarding Motion for Leave to File Third Amended Complaint (ECF. No. 478) (the "Objection").

2. On June 10, 2021, Plaintiffs filed a Motion for Leave to File a Third Amended Complaint. ECF No. 458.

3. The Court held a hearing on July 28, 2021 during which the Court denied, without prejudice, Plaintiffs' Motion to File a Third Amended Complaint and directed Plaintiffs to file a motion to reconsider before the district court judge. (ECF No. 474.)

4. On August 2, 2021, Plaintiffs filed their Motion and Objection.

5. Defendants' respective responses to the Motion and Objection would ordinarily be due fourteen (14) days after filing, on August 16, 2021.

6. Due to various attorney conflicts and competing deadlines including several depositions taking place in this case and related cases involving the same parties, Defendants requested an extension to respond to the Motion and Objection. The parties have reached an agreement stipulating that Defendants be permitted an additional seven (7) days to respond to Plaintiffs' Motion and Objection, resulting in a response date of August 23, 2021.

7. This stipulated extension is requested in good faith and for good cause, and is
not intended to unduly delay proceedings in any manner. Accordingly, the parties respectfully
request that the Court grant the proposed extensions discussed herein.

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1 2 3 4 5 6 7 7 8 9 10 11 12 300 S. 4th Street, Suite 1520 10 11 12 130 S. 4th Street, Suite 1520 11 13 13 14 15 15 16 17 18 19 10 17 18 19 10 17 18 19 20 21 22 23 24 23 24 22 23 24 22 23 24 22 23 24 22 23 24 22 23 24 22 23 24 22 23 24 22 23 24 22 23 24 23 24 22 23 24 22 23 24 23 24 24 25 24 24 25 24 24 24 24 24 25 24 24 24 24 24 25 24 24 24 24 24 24 24 24 24 24 24 24 24	DATED: August 10, 2021 PISANELLI BICE PLLC By: <u>Seth A. Horvath</u> Todd L. Bice, Esq., Bar No. 4534 <b>Pisanelli Bice PLLC</b> 400 South 7th Street, Suite 300 Las Vegas, Nevada 89101 Telephone: (702) 214-2100 Facsimile: (702) 214-2101 tb@pisanellibice.com F. Thomas Hecht (pro hac vice) Tina B. Solis (pro hac vice) Seth A. Horvath (pro hac vice) Nixon Peabody LLP 70 West Madison Street, Suite 3500 Chicago, Illinois 60602 fthecht@nixonpeabody.com tbsolis@nixonpeabody.com sahorvath@nixonpeabody.com Attorneys for Plaintiffs Newmark Group Inc., G&E Acquisition Company, LLC, and BGC Real Estate of Nevada, LLC. IT IS SO UNITED	DATED: August 10, 2021 GORDON REES SCULLY MANSUKHANI, LLP By: <u>Robert S. Larsen</u> Wing Y. Wong Gordon & Rees Scully Mansukhani LLP 300 S. 4th St., Suite 1550 Las Vegas, Nevada 89101 Tel. (702) 557-2858 rlarsen@grsm.com wong@grsm.com Nathaniel J. Kritzer (pro hac vice) Steptoe & Johnson LLP Firm ID No. 43315 114 6th Avenue New York, NY 10036 nkritzer@steptoe.com Attorneys for Defendants Avison Young (Canada) Inc., Avison Young (USA) nc., Avison Young–Nevada LLC, Mark Rose, Joseph Kupiec, The Nevada Commercial Group LLC, and John Pinjuw DEDERED: August 11, 2021 -3-