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12 *Avison Young (Canada) Inc., Avison Young*
13 *(USA) Inc., Avison Young-Nevada, LLC,*
14 *Mark Rose, Joseph Kupiec, The Nevada*
15 *Commercial Group, and John Pinjuv*

14 **UNITED STATES DISTRICT COURT**
15 **FOR THE DISTRICT OF NEVADA**

16 NEWMARK GROUP, INC., G&E ACQUISITION) CASE NO.: 2:15-cv-00531-RFB-GWF
17 COMPANY, LLC, and BGC REAL ESTATE OF)
18 NEVADA, LLC,)
19 vs. Plaintiffs,) **STIPULATION AND ORDER TO**
20 AVISON YOUNG (CANADA) INC.; AVISON) **EXTEND DEADLINES FOR**
21 YOUNG (USA) INC.; AVISON YOUNG -) **RESPONSES AND REPLIES TO**
22 NEVADA, LLC, MARK ROSE, THE NEVADA) **DISPOSITIVE MOTIONS**
23 COMMERCIAL GROUP, JOHN PINJUV, and) **(SECOND REQUEST)**
24 JOSEPH KUPIEC; DOES 1 through 5; and ROE)
25 BUSINESS ENTITIES 6 through 10 ,)
26 Defendants.)

1 Pursuant to Local Rules IA 6-1, IA 6-2, and LR 7-1, Plaintiffs Newmark Group, Inc.
2 G&E Acquisition Company, LLC, and BGC Real Estate of Nevada, LLC (“Plaintiffs”) and
3 Defendants Avison Young (Canada) Inc., Avison Young (USA) Inc., Avison Young –
4 Nevada, LLC, Mark Rose, The Nevada Commercial Group, John Pinjuv, and Joseph Kupiec
5 (“Defendants”), by and through their respective attorneys of record, stipulate as follows:

6 1. On January 3, 2023, in connection with ruling that Defendants were permitted
7 additional deposition time with Plaintiffs’ Rule 30(b)(6) witness, the Court reset the deadline
8 for dispositive motions to March 15, 2023, with responses due no later than April 17, 2023 and
9 replies due no later than May 1, 2023. ECF No. 615. On March 9, 2023, this Court granted the
10 parties’ first stipulation of time to extend the deadlines for filing dispositive motions, with
11 motions due March 29, 2023, responses due by May 1, 2023, and replies due by May 15,
12 2023.

13 2. The parties filed their dispositive motions on March 29, 2023, in accordance
14 with the March 9, 2023 So Ordered stipulation. The parties hereby stipulate to extend the
15 deadlines for responses and replies to these motions. This is the second stipulation of time to
16 extend these deadlines.

17 3. Due to various demands on counsel’s time and the length of the dispositive
18 motions at issue, the parties have reached an agreement and hereby stipulate that both parties
19 be allowed an additional 25 days to file responses to dispositive motions, resulting in a due
20 date of May 26, 2023.

21 4. The parties hereby stipulate and agree to extend the deadline for replies by a
22 corresponding 32 days, resulting in a deadline of no later than June 16, 2023 for replies.

23 5. This proposed stipulation and Order is made in good faith and is not intended to
24 delay or otherwise impede the expeditious resolution of this matters, or otherwise burden the
25 Court in any manner.
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DATED: March 31, 2023

PISANELLI BICE PLLC

By: /s/ Tina B. Solis

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*Attorneys for Plaintiffs Newmark Group
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DATED: March 31, 2023

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IT IS SO ORDERED:



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED this 31st day of March, 2023.