

1 JEFFREY A. SMITH, ESQ.
 2 Colorado Bar No. 31038
 3 *Motion for Permission to Practice*
 4 *Pro Hac Vice and Designation of*
 5 *Local Counsel Pursuant to*
 6 *LR IA 10-2 Pending*
 7 **SMITH BYERS LLC**
 8 5480 Valmont Rd., Suite #200
 9 Boulder, Colorado 80301
 10 Telephone: (303) 541-1565
 11 Facsimile: (303) 223-2819
 12 E-Mail: jeff@smithbyerslaw.com

9 ADAM H. SPRINGEL, ESQ.
 Nevada Bar No. 7187
 10 MICHAEL A. ARATA, ESQ.
 Nevada Bar No. 11902
 11 **SPRINGEL & FINK LLP**
 12 10655 Park Run Drive, Suite 275
 13 Las Vegas, Nevada 89144
 14 Telephone: (702) 804-0706
 15 Facsimile: (702) 804-0798
 16 E-Mail: aspringel@springelfink.com
 17 marata@springelfink.com

16 *Attorneys for Defendant*
 17 *INFONOW CORPORATION dba*
 18 *CHANNELINSIGHT*

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

19 NAHUM RAND,
 20 Plaintiff,
 21 vs.

22 MICHAEL PATSALOS-FOX; PAUL
 23 BARTLETT; MICHAEL PATTERSON; TIM
 24 CONNOR; RHO VENTURES; VEDANTA
 25 CAPITAL LP; SEQUEL VENTURE
 26 PARTNERS; INFONOW CORPORATION dba
 27 CHANNELINSIGHT; DOES I through X,
 28 inclusive; and ROE CORPORATIONS I
 through X, inclusive,
 Defendants.

Case No.: 2:15-cv-01510-RFB-GWF

**STIPULATION TO EXTEND TIME FOR
 DEFENDANTS MICHAEL PATSALOS-
 FOX, MICHAEL PATTERSON,
 VEDANTA CAPITAL, LP AND PAUL
 BARTLETT TO RESPOND TO
 PLAINTIFF'S FIRST AMENDED
 COMPLAINT [1-1]**

(First Request)

1 Defendant INFONOW CORPORATION dba CHANNELINSIGHT (“InfoNow”) and
2 Plaintiff NAHUM RAND, by and through their counsel of records, hereby stipulate to allow
3 Defendants Michael Patsalos-Fox, Michael Patterson, Vedanta Capital, LP and Paul Bartlett
4 (collectively, “Defendants”) an extension of time to file their responses to Plaintiff’s First
5 Amended Complaint. In furtherance of the Stipulation, Defendants state as follows:

6 1. Defendants’ response to the First Amended Complaint is due on Tuesday, August
7 25, 2015.

8 2. Due to the press of business of Defendants’ lead counsel and other pre-existing
9 obligations, Defendants require an additional 15 days, up to and including September 9, 2015 in
10 which to file their response to the First Amended Complaint.

11 3. Additionally, because Defendants believe there are threshold personal
12 jurisdictional questions raised by the First Amended Complaint, counsel for the parties are
13 discussing ways to resolve jurisdictional concerns and avoid burdening the Court with
14 unnecessary motions. However, the parties need additional time to work through these
15 discussions.

16 4. Plaintiff’s counsel, Erik W. Fox, has stipulated to the requested extension of time.

17 5. This is the first extension of time sought by Defendants.

18 6. The requested extension will not prejudice the parties, especially since not all
19 defendants have been served, nor will the requested extension prejudice the Court.

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 WHEREFORE, for the foregoing reasons, InfoNow and Plaintiff respectfully requests
2 that the Court accept this Stipulation and extend the time for Defendants to respond to the First
3 Amended Complaint to September 9, 2015.

4 DATED this 20th day of August, 2015.


5
6 /s/ Jeffrey A. Smith
7 JEFFREY A. SMITH, ESQ.
8 Colorado Bar No. 31038
9 *Motion for Permission to*
10 *Practice*
11 *Pro Hac Vice and Designation of*
12 *Local Counsel Pursuant to*
13 *LR IA 10-2 Pending*
14 **SMITH BYERS LLC**
15 5480 Valmont Rd., Suite #200
16 Boulder, Colorado 80301
17 Telephone: (303) 541-1565
18 E-Mail: jeff@smithbyerslaw.com
19 *Attorney for Defendant*
20 *INFONOW CORPORATION dba*
21 *CHANNELINSIGHT*

22 /s/ Adam H. Springel
23 ADAM H. SPRINGEL, ESQ.
24 Nevada Bar No. 7187
25 MICHAEL A. ARATA, ESQ.
26 Nevada Bar No. 11902
27 **SPRINGEL & FINK LLP**
28 10655 Park Run Drive, Ste. 275
Las Vegas, Nevada 89144
Telephone: (702) 804-0706
E-Mail: aspringel@springelfink.com
marata@springelfink.com
Attorneys for Defendant INFONOW
CORPORATION dba
CHANNELINSIGHT

16 /s/ Erik W. Fox
17 ERIK W. FOX, ESQ.
18 Nevada Bar No. 8804
19 **MARQUIS AURBACH**
20 **COFFING**
21 10001 Park Run Drive
22 Las Vegas, NV 89145
23 Telephone: (702) 382-0711
24 E-Mail: efox@maclaw.com
25 *Attorney for Plaintiff*

26 **IT IS SO ORDERED.**

27 Dated: August 24, 2015

28 
GEORGE FOLEY, JR.
United States Magistrate Judge

1 **CERTIFICATE OF SERVICE**

2 Pursuant to Local Rule 5 of this Court, I certify that I am an employee of Springel & Fink
3 LLP and that on this 20th day of August, 2015, I caused a correct copy of the foregoing
4 **STIPULATION TO EXTEND TIME FOR DEFENDANTS MICHAEL PATSALOS-FOX,**
5 **MICHAEL PATTERSON, VEDANTA CAPITAL, LP AND PAUL BARTLETT TO**
6 **RESPOND TO PLAINTIFF'S FIRST AMENDED COMPLAINT [1-1] (First Request)** to
7 be served via CM/ECF to:

8 Erik W. Fox, Esq.
9 efox@maclaw.com
10 **MARQUIS AURBACH COFFING**
11 10001 Park Run Drive
12 Las Vegas, NV 89145
13 Telephone (702) 382-0711
14 Facsimile (702) 382-5816
15 *Attorney for Plaintiff*

16
17
18
19
20
21
22
23
24
25
26
27
28

/s/ Erin L. Wood

An employee of Springel & Fink LLP