

1 BAUMAN LAW FIRM
 2 FREDERICK C. BAUMAN
 (Nevada Bar No. 8370)
 3 fred@lawbauman.com
 6440 Sky Pointe Dr., Ste 140-149
 Las Vegas, NV 89131
 (702) 533-8372
 4 NO FAX NUMBER

5 Attorney for Defendants CGrowth Capital, Inc,
 6 William M. Wright, III and Keystone Financial
 Management, Inc.

7 GARMAN TURNER GORDON LLP
 8 DYLAN T. CICILIANO
 Nevada Bar No. 12348
 Email: dciciliano@gtg.legal
 9 650 White Drive, Suite 100
 Las Vegas, NV 89119
 10 Tel: (725) 777-3000
 Fax: (725) 777-3112

11 TOLLEFSEN LAW PLLC
 12 Fara Daun
 Pro Hac Vice
 13 fara@tollefsenlaw.com
 2122 164th St. SW, Ste 300
 14 Lynnwood, WA 98087-7812
 Tel: (425) 673-0300

15 Attorneys for Plaintiffs Philip and Karen Wingen

16
 17
 18 **UNITED STATES DISTRICT COURT**
 19 **DISTRICT OF NEVADA**
 20

21 PHILIP WINGEN and KAREN WINGEN,
 husband and wife, and the marital community
 22 comprised thereof;
 23 Plaintiffs,

24 vs.

25 VENTRUM ENERGY CORP., a Nevada
 26 corporation; SALT CREEK WEST DRILLING
 FUND, LLP, a Nevada limited liability
 27 partnership; VENTRUM LOUISIANA, LLP, a
 Nevada limited liability partnership; MACKEL
 28 AMERICA CORP, a Nevada corporation; NV

) **Case No.: 2:15-CV-02043-JCM-VCF**
) **Hon. James C. Mahan**
)
) **STIPULATION AND ORDER TO**
) **EXTEND TIME TO RESPOND TO**
) **COMPLAINT**

1 AMERICA CORP., a Nevada corporation;)
 ANDREWW T. VAN SLEE a/k/a ANDREW)
 2 SLEE, and JANE DOE VAN SLEE, a married)
 couple, and the marital community comprised)
 3 thereof; CATHERINE ELKINS and JOHN DOE)
 ELKINS, a married couple, and the marital)
 4 community comprised thereof; MARY HILL)
 5 and JOHN DOE HILL, a married couple, and)
 the marital community comprised thereof;)
 6 FOSSIL ENERGY, INC., a Delaware)
 7 corporation; WEST SALT CREEK, INC., a)
 Wyoming corporation; MONTGOMERY)
 8 GEORGE; PAUL GRADY and JANE DOE)
 GRADY, a married couple, and the marital)
 9 community comprised thereof; WILLIAM)
 10 STURDEVANT; TARI VICKERY; SAMCO)
 OIL, LLC, a Delaware limited liability company)
 11 BKV VENTURES, LLC, a Louisiana limited)
 liability company; AVIHAIL KOCHLANI and)
 12 JANE DOE KOCHLANI, a married couple, and)
 marital community comprised thereof;)
 13 CGROWTH CAPITAL, INC., a Delaware)
 14 corporation; WILLIAM M. WRIGHT, III and)
 15 JANE DOE WRIGHT, a married couple, and the)
 marital community comprised thereof;)
 16 KEYSTONE FINANCIAL MANAGEMENT,)
 INC., a Washington corporation and JOHN DOES)
 17 THROUGH 50 INCLUSIVE;)
 Defendants)
 18)
 19)

20 **STIPULATION AND ORDER TO EXTEND TIME TO RESPOND TO COMPLAINT**
 21 **(First Request)**

22 WHEREAS, Defendants CGrowth Capital, Inc., William M. Wright, III and Keystone
 23 Financial Management, Inc. (collectively referred to herein as the “CGrowth Defendants”) were
 24 served with the Summons and Complaint in this action on November 13, 2015;

25 WHEREAS, the deadline for the CGrowth Defendants to respond to the Complaint is
 26 December 3, 2015; and

27 WHEREAS, the CGrowth Defendants retained Nevada counsel to represent them on
 28

1 December 2, 2015 and said counsel requires time to review the Complaint and prepare an Answer or
2 other response thereto;

3 IT IS HEREBY STIPULATED by and between the Parties, through their undersigned counsel
4 of record, and subject to the Court's approval, that:

- 5
6 1. The CGrowth Defendants shall be given an additional 21 days to answer or otherwise
7 respond to the Complaint; the CGrowth Defendants will file an answer or other response
8 to the Complaint on or before December 24, 2015.

9
10 DATED: December 2, 2015

BAUMAN LAW FIRM

11
12
13 By Frederick C. Bauman

Frederick C. Bauman, Bar No. 8370

fred@lawbauman.com

6440 Sky Pointe Dr., Ste 140-149

Las Vegas, NV 89131

(702) 533-8372

NO FAX NUMBER

14
15
16
17 Attorney for Defendants CGrowth Capital, Inc,
18 William M. Wright, III and Keystone Financial
Management, Inc.

19 DATED: December 2, 2015

TOLLEFSEN LAW PLLC

20
21 

22 By _____

Fara Daun, Pro Hac Vice, WA Bar No.27306

Email: fara@tollefsenlaw.com

2122 164th St. SW, Ste 300

Lynnwood, WA 98087-7812

Tel: (425) 673-0300

23
24
25
26 Dylan T. Ciciliano, Bar No. 12348

GARMAN TURNER GORDON LLP

Email: dciciliano@gtg.legal

650 White Drive, Ste 100

Las Vegas, NV 89119

Tel: (725) 777-3000

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Fax: (725) 777-3112

Attorneys for Plaintiffs Phillip and Karen
Wingen

IT IS SO ORDERED:

December 3, 2015

Date: _____



Cam Ferenbach, U.S. Magistrate Judge