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

10
 11 BARTECH SYSTEMS INTERNATIONAL,
 12 INC., a Delaware corporation,

13 Plaintiff,

14 v.

15 MOBILE SIMPLE SOLUTIONS, INC., a
 Delaware corporation, MOBILE SIMPLE
 SOLUTIONS (IAS), INC., a Canadian
 16 corporation, GEM SA, a Belgian corporation,
 VINCENT TESSIER, an individual,
 17 CHRISTELLE PIGEAT, an individual,

18 Defendants.

Case No. 2:15-cv-02422-MMD-NJK

**STIPULATION AND ORDER TO
 EXTEND TIME FOR NON-PARTY
 SNELL AND WILMER L.L.P. TO
 RESPOND TO PLAINTIFF'S MOTION
 TO COMPEL NON-PARTY SNELL &
 WILMER, LLP'S RESPONSE TO
 BARTECH'S SUBPOENA AND
 NOTICE TO TAKE DEPOSITION
 DUCES TECUM**

(FIRST REQUEST)

19
 20 Pursuant to LR IA 6-1 and 6-2, Snell & Wilmer L.L.P. ("Snell & Wilmer") and Plaintiff
 21 Bartech Systems International, Inc.'s ("Plaintiff") through their counsel of record, hereby
 22 stipulate and request an order from the Court to extend the time for Snell and Wilmer to respond
 23 to Plaintiff's Motion to Compel Non-Party Snell & Wilmer, LLP's Response to Bartech's
 24 Subpoena and Notice to Take Deposition *Duces Tecum* filed on November 17, 2017 as follows:

25 Snell and Wilmer L.L.P. is not a party to this matter, but the pending motion seeks
 26 documents from Snell & Wilmer. As former counsel to Defendants, Snell & Wilmer believes it
 27 must take additional precautions due to its obligations under Nevada's Rules of Professional
 28 Conduct. In light of these burdens and obligations, Plaintiff and Snell & Wilmer hereby stipulate


1 and request an order from the Court continuing Snell & Wilmer's response deadline to December
2 18, 2017, and Plaintiff's reply deadline (if any) to December 26, 2017. This is the first stipulation
3 for extension of Snell & Wilmer's time to respond to Plaintiff's Motion to Compel Non-Party
4 Snell & Wilmer, LLP's Response to Bartech's Subpoena and Notice to Take Deposition *Duces*
5 *Tecum*.

6 Dated: November 29, 2017.

Dated: November 29, 2017.

7 SNELL & WILMER L.L.P.

PARSONS BEHLE & LATIMER

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9
10 By: 
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22 **IT IS SO ORDERED.**

23 
24 UNITED STATES MAGISTRATE JUDGE

DATED: November 29, 2017

25 4836-3237-2567