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16 Attorneys for Plaintiff/Counter-Defendant
 17 BARTECH SYSTEMS INTERNATIONAL, INC.

18 **UNITED STATES DISTRICT COURT**
 19 **DISTRICT OF NEVADA**

20 BARTECH SYSTEMS INTERNATIONAL,
 21 INC., a Delaware corporation,
 22 Plaintiff,
 23 vs.
 24 MOBILE SIMPLE SOLUTIONS, INC., a
 Delaware corporation, 8854831 Canada Inc., a
 25 Canadian corporation, GEM SA, a Belgian
 company, MOBILE SIMPLE SOFTWARE
 26 SERVICES(FRANCE), a French company,
 27 VINCENT TESSIER, an individual,
 CHRISTELLE PIGEAT, an individual,

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

**STIPULATION TO STAY CASE AND
 REMOVE TRIAL DATE**

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Defendants.

MOBILE SIMPLE SOLUTIONS, INC., a
Delaware corporation, VINCENT TESSIER,
an individual, CHRISTELLE PIGEAT, an
individual, GEM SA, a Belgian corporation,

Counterclaimants,

vs.

BARTECH SYSTEMS INTERNATIONAL,
INC., a Delaware corporation,

Counter-defendant.

Plaintiff and Counter-defendant Bartech Systems International, Inc. (“Bartech”) and Defendant and Counterclaimants GEM SA (“GEM”) and Mobile Simple Software Services(France) (“Mobile France”), by and through their attorneys, and Vincent Tessier, in proper person (collectively, the “Parties”), hereby stipulate and agree as follows:

1. The Parties have entered into a Settlement Agreement and consent Order of Final Judgment of a Permanent Injunction and Declaratory Relief that, among other things, resolves the Parties’ claims made against each other in this matter and renders the trial set to commence on November 27, 2018 moot.

2. Because the Settlement Agreement and Order of Final Judgment of a Permanent Injunction and Declaratory Relief include two individuals in bankruptcy, the Parties are seeking the approval of the U.S. Bankruptcy Court for the District of Nevada on an expedited basis.

3. Once bankruptcy court approval is obtained, the Parties intend to file a Stipulation and the Order of Final Judgment of a Permanent Injunction and Declaratory Relief for entry by this Court.

4. This Court has discretionary power to stay this matter. *Landis v. N.A. Co.*, 299 U.S. 248, 254-55 (1936) (“[T]he power to stay proceedings is incidental to the power inherent in every

1 court to control the disposition of the causes on its docket with economy of time and effort for itself,
2 for counsel, and for litigants. How this can best be done calls for the exercise of judgment which
3 must weigh competing interests and maintain an even balance.”); *see also Lockyer v. Mirant Corp.*,
4 398 F.3d 1098, 1109 (9th Cir. 2005); *United States v. Grace*, 526 F.3d 499, 516 (9th Cir. 2008) (en
5 banc) (holding that district courts have broad authority to, among other things, manage their own
6 docket); *cf.* Fed. R. Civ. P. 1, 79.

8 5. The Parties agree that a stay of all deadlines pending resolution of the proceedings
9 that seek approval of the Settlement Agreement and Order of Final Judgment of Permanent
10 Injunction and Declaratory Relief is appropriate and serves the interests of judicial economy and
11 presents the most efficient and least expensive method of resolving this matter.

12 6. The Parties further agree that the trial set to commence on November 27, 2018 is
13 moot, and it is thus appropriate to remove that trial date from the docket.

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15 PARSONS BEHLE & LATIMER

GREENE INFUSO, LLP

16
17 /s/ Michael R. Kealy

 /s/ Michael V. Infuso

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***(Signed by filing attorney with
with permission of counsel)***
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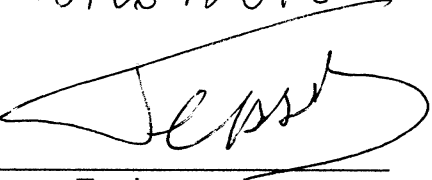
– and –

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6 10/26/2018
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14 Defendant in Proper Person

15 IT IS SO ORDERED:

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17 

18 UNITED STATES DISTRICT JUDGE

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20 DATED: October 26, 2018

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I am an employee of the law firm of Parsons Behle & Latimer and
3 that on the 26th day of October, 2018, I filed a true and correct copy of the foregoing Stipulation
4 to Stay Case and Remove Trial Date with the Clerk through the Court's CM/ECF system, which
5 sent electronic notification to all registered users as follows:

6
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13 -and- via Courtesy Email (listed below) and U.S. Mail, at Reno, Nevada, in sealed envelopes with
14 first-class postage fully prepaid and addressed as follows:

15 Mobile Simple Solutions, Inc.
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22
23 /s/ Kathy Souviron
24 Employee of Parsons Behle & Latimer
25
26
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