

Ryan Gile, Esq.
Nevada Bar No. 8807
rgile@weidemiller.com
F. Christopher Austin, Esq.
Nevada Bar No. 6559
caustin@weidemiller.com
WEIDE & MILLER, LTD.
7251 W. Lake Mead Blvd., Suite 530
Las Vegas, NV 89128-8373
Tel: (702) 382-4804
Fax: (702) 382-4805

Attorneys for Plaintiff The Hackett Miller Company, Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

THE HACKETT MILLER COMPANY, INC., a Nevada corporation,

Plaintiff,

V.

GFOUR PRODUCTIONS, LLC, a Florida limited liability company; and SPOTLIGHT RIGHTS, LLC, a Florida limited liability company,

Defendants.

Case No.: 2:16-cv-00418-RFB-NJK

**STIPULATION AND (PROPOSED)
ORDER FOR EXTENSION OF TIME
FOR PLAINTIFF TO FILE AN
OPPOSITION TO DEFENDANTS'
MOTION TO DISMISS FOR:
(1) LACK OF PERSONAL
JURISDICTION, (2) FAILURE TO
JOIN A NECESSARY PARTY,
(3) IMPROPER VENUE, AND
(4) REQUEST TO TRANSFER VENUE**

Plaintiff THE HACKETT MILLER COMPANY, INC. and Defendants GFOUR PRODUCTIONS, LLC and SPOTLIGHT RIGHTS LLC, by and through their undersigned counsel, hereby stipulate and agree to an 15-day extension of time up to and including September 30, 2016, for Plaintiff to file an Opposition to Defendants' Motion to Dismiss for: (1) Lack of Personal Jurisdiction, (2) Failure to Join a Necessary Party, (3) Improper Venue, and (4) Request to Transfer Venue in the above-captioned matter (ECF No. 22) ("Motion to Dismiss").

Defendant's Motion to Dismiss was filed on August 29, 2016. On September 13, 2016, the parties filed a Stipulation giving Plaintiff a 15-day extension of time to file an Opposition to

1 Defendants' Motion to Dismiss (ECF No. 23) (the "First Extension Request") which extended the
2 original deadline for Plaintiff's Opposition to Defendants' Motion to Dismiss to September 30,
3 2016. The Court has not yet signed the First Extension Request.

4 By and through this Stipulation, the parties agree to extend the deadline for Plaintiff to file
5 Plaintiff's Opposition to Defendants' Motion to Dismiss to October 17, 2016. This is Plaintiff's
6 second request for an extension of time for Plaintiff to file an Opposition to Defendants' Motion
7 to Dismiss. Plaintiff requests an extension of time to file an Opposition to Defendants' Motion
8 to Dismiss in order to avoid unfairly prejudicing Plaintiff in this matter. Plaintiff's counsel is
9 presently scheduled to appear for a jury trial commencing October 3rd and continuing through
10 October 7, 2016. Given the necessity of devoting full attention to the trial and final preparations
11 for the same, absent the brief extension requested, Plaintiff's counsel will be unable to
12 competently and fully address the complex jurisdictional and venue issues raised in Defendants'
13 Motion to Dismiss, thus unfairly prejudicing Plaintiff in this matter. Defendants, through this
14 stipulation, have agreed to Plaintiff's requested extension under the circumstances.

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 For these reasons, this Request is made for good cause and not for purposes of delay.

2 Dated: September 28, 2016

3 Respectfully Submitted,

5 /s/ Ryan Gile

6 Ryan Gile (NV Bar No. 8807)
rgile@weidemiller.com
7 F. Christopher Austin (NV Bar No. 6559)
caustin@weidemiller.com
WEIDE & MILLER, LTD.
8 7251 W. Lake Mead Blvd., Suite 530
Las Vegas, NV 89128
9 Tel: 702-382-4804
Fax: 702-382-4805

10 Attorneys for Plaintiff, The Hackett
11 Miller Company, Inc.

Dated: September 28, 2016

Respectfully Submitted,

5 /s/ Jonathan Winter

6 Gene S. Winter (pro hac vice)
gwinter @ssjr.com
7 Jonathan A. Winter (pro hac vice)
jwinter@ssjr.com
**ST. ONGE STEWARD JOHNSTON AND
REENS LLC**
986 Bedford Street
Stamford, CT 06905-5619
Tel: 203-324-6155
Fax: 203-327-1096

Ronald D. Green (NV Bar No. 7360)
Alex J. Shepard (NV Bar No. 13582)
RANDAZZA LEGAL GROUP, PLLC
4035 S. El Capitan Way
Las Vegas, NV 89147
Tel: 702-420-2001
Fax: 305-437-7662
ecf@randazza.com

15 Attorneys for Defendants, GFour Productions,
16 LLC and Spotlight Rights, LLC

18 **IT IS SO ORDERED.**



20 RICHARD F. BOULWARE, II
21 United States District Judge

22 DK #23 - MOOT.

24 DATED this 10th day of October, 2016.

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Weide & Miller, Ltd. and that on September 28, 2016, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I further certify that a true and correct copy of the foregoing document will be served via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ James L. Morris
An employee of WEIDE & MILLER, LTD.