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 10 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

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

12 Plaintiff,

13 v.

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

16 Defendants.

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

**STIPULATION AND (PROPOSED)
 ORDER FOR EXTENSION OF TIME
 FOR PARTIES TO FILE A
 DISCOVERY PLAN AND
 SCHEDULING ORDER PURSUANT
 TO THE COURT’S ORDER DATED
 MARCH 31, 2017**

(Second Request)

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 19 Plaintiff THE HACKETT MILLER COMPANY, INC. (“Plaintiff”), and Defendants
 20 GFOUR PRODUCTIONS, LLC and SPOTLIGHT RIGHTS LLC (“Defendants”), by and
 21 through their undersigned counsel, hereby stipulate and agree to a second 14-day extension of
 22 time up to and including May 5, 2017, for the parties to file a Joint Discovery Plan and Scheduling
 23 Order with the Court pursuant to the Court’s Minute Order dated March 31, 2017 (ECF No. 29).

24 On March 30, 2017, the Court denied without prejudice Defendant’s Motion to Dismiss
 25 for (1) Lack of Personal Jurisdiction, (2) Failure to Join a Necessary Party, and (3) Improper
 26 Venue, and (4) Request to Transfer Venue (ECF No. 22) and ordered the parties to engage in
 27 jurisdictional discovery for a period of 60 days commencing March 31, 2017, and to submit a
 28 joint proposed discovery/scheduling order within one week from March 31, 2017.

1 On April 7, 2017, the parties filed a stipulation to extend the time to file a discovery plan
2 for 14 days (ECF No. 30) because the parties had reached a settlement framework which would
3 dismiss the action entirely and wanted additional time to allow the parties to finalize settlement
4 in the form of a formal written settlement agreement. On April 10, 2017, the Court granted the
5 stipulation of the parties (ECF No. 31). While Plaintiff’s counsel diligently prepared a draft
6 written settlement agreement for Defendants’ review (and even offered to provide an unapproved
7 draft to Defendants’ counsel in order to allow Defendant to review the substance of the agreement
8 and keep the settlement process moving forward expeditiously), Plaintiff’s counsel was unable to
9 obtain client approval on the draft due to vacation travel plans by Plaintiff’s principals until April
10 17, 2017. Defendants’ counsel provided proposed revisions to the settlement agreement on April
11 20, 2017.

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1 By this Stipulation, the parties request that the deadline to file a joint proposed discovery
2 plan/scheduling order be extended another 14 days to May 5, 2017. This is the second request for
3 an extension of time by both parties to file the joint proposed discovery/scheduling order. Good
4 cause exists for this second request because while the parties remain optimistic about the prospects
5 of settlement, they require additional time in order to address the remaining issues that exist
6 between the parties and finalize such settlement. For this reason, this stipulated second request is
7 made for good cause and not for purposes of delay.

8 Dated: April 21, 2017

Dated: April 21, 2017

9 Respectfully Submitted,

Respectfully Submitted,

10 /s/ Ryan Gile

/s/Gene S. Winter

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23 LLC and Spotlight Rights, LLC

IT IS SO ORDERED.



24 RICHARD F. BOULWARE, II
25 United States District Judge

26 Dated: May 2, 2017.