| 1<br>2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11 | Reza Mirzaie, Esq.<br>(Pro Hac Vice to be submitted)<br><i>rmirzaie@raklaw.com</i><br>Stanley H. Thompson, Jr., Esq.<br>(Pro Hac Vice to be submitted)<br><i>sthompson@raklaw.com</i><br><b>RUSS, AUGUST &amp; KABAT</b><br>12424 Wilshire Boulevard, 12 <sup>th</sup> Floor<br>Los Angeles, California 90025<br>Telephone: (310) 826-7474<br>Facsimile: (310) 826-6991<br>Mark Borghese, Esq.<br>Nevada Bar No. 6231<br><i>mark@borgheselegal.com</i><br><b>BORGHESE LEGAL, LTD.</b><br>10161 Park Run Drive, Suite 150<br>Las Vegas, Nevada 89145<br>T: (702) 382-0200<br>F: (702) 382-0212<br>Attorneys for Plaintiff |   |
|---|--|---|
| 12  | UNITED STATES DISTRICT COURT   |   |
| 13  | DISTRICT OF NEVADA   |   |
| 14  | 2 WAY COMPLITING INC. a Neveda   | Case No 2.1( av 00420 CMN CWII  |
| 15  | 2-WAY COMPUTING, INC., a Nevada corporation,   | ) Case No.: 2:16-cv-00420-GMN-CWH   |
| 16<br>17  | Plaintiff,<br>v.   | )<br>UNOPPOSED MOTION AND<br>PROPOSED] ORDER TO EXTEND<br>DEADLINE FOR DEFENDANT TO |
| 18  | SHORETEL, INC., a Delaware corporation,  | RESPOND TO COMPLAINT  |
| 19  | Defendant.   | (SECOND REQUEST)  |
| 20  |  |   |
| 21  | Plaintiff 2-Way Computing, Inc. ("Plaintiff") hereby files this Unopposed Motion and   |   |
| 22  | [Proposed] Order to Extend Deadline for Defendant to Respond to the Complaint in accordance  |   |
| 23  | with LR IA 6-1 and LR IA 6-2. This is the second request to extend the proposed deadline. This   |   |
| 24  | request is not made after the response deadline which is currently May 15, 2016.   |   |
| 25  | The Complaint (Doc. 1) was filed on February 29, 2016 and was served on ShoreTel, Inc.   |   |
| 26  | on or about March 25, 2016. A first extension to respond to the complaint was granted until May  |   |
| 27  | 15, 2016.  |   |
| 28  | ///  |   |

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| 1  | Plaintiff is currently in the process of fin   | nalizing an agreement which will resolve the claims                    |  |  |
|--|--|--|--|--|
|  |  |  |  |  |
| 2 in this litigation against Defendant. Plaintiff believes this agreement will be execu                    |  |  |  |  |
| 3  | 3 few weeks and thereafter this case can be dismissed  |  |  |  |
| 4  | 4 The parties believe that the litigation of this matter will be best served by allowing an      |  |  |  |
| 5  | 5 additional thirty (30) days to work on a resolution of this matter. Because an attorney fo     |  |  |  |
| 6  | Defendant has not made an appearance in this case, Plaintiff files this motion to extend         |  |  |  |
| 7  | 7 Defendant's deadline as an unopposed motion.   |  |  |  |
| 8  | 8 Accordingly, Plaintiff respectfully requests that this Court grant its request to continue the |  |  |  |
| 9  | deadline for Defendant to respond to the Complaint until June 14, 2016.                          |  |  |  |
| 10   |  |  |  |  |
| 11   |  | Borghese Legal, Ltd.   |  |  |
| 12   |  | /a/ Mark Dough ago   |  |  |
| 13   | DATED: <u>May 10, 2016.</u>  | /s/ Mark Borghese  |  |  |
| 14   |  | Mark Borghese, Esq.<br>10161 Park Run Drive, Suite 150                 |  |  |
| 15   |  | Las Vegas, Nevada 89145  |  |  |
| 16   |  | RUSS, AUGUST & KABAT<br>Reza Mirzaie, Esq.                             |  |  |
| 17   |  | Stanley H. Thompson, Jr., Esq.<br>12424 Wilshire Boulevard, 12th Floor |  |  |
| 18   |  | Los Angeles, California 90025<br>Attorneys for Plaintiff               |  |  |
| 19   | <u>ORDER</u>   |  |  |  |
| 20   |  |  |  |  |
| 21   | IT IS SO ORDERED.  |  |  |  |
| 22   | Curst  |  |  |  |
| 23   | UNITED STATES MAGISTRATE JUDGE   |  |  |  |
| 24   | DATED: May 12, 2016  |  |  |  |
| 25   | DATED.   |  |  |  |
| 26   |  |  |  |  |
| 27   |  |  |  |  |
| 28   |  |  |  |  |
| BORGHESE LEGAL, LTD.<br>10161 PARK RUN DRIVE,<br>SUITE 150<br>LAS VEGAS,<br>NEVADA 89145<br>(702) 382-0200 | 2016-05-10-Unopposed Motion for Extension of Time.docx   | 2  |  |  |

