1 2 3 4 5 6 7 8 9 10 11	Reza Mirzaie, Esq. (Pro Hac Vice to be submitted) <i>rmirzaie@raklaw.com</i> Stanley H. Thompson, Jr., Esq. (Pro Hac Vice to be submitted) <i>sthompson@raklaw.com</i> RUSS, AUGUST & KABAT 12424 Wilshire Boulevard, 12 th Floor Los Angeles, California 90025 Telephone: (310) 826-7474 Facsimile: (310) 826-6991 Mark Borghese, Esq. Nevada Bar No. 6231 <i>mark@borgheselegal.com</i> BORGHESE LEGAL, LTD. 10161 Park Run Drive, Suite 150 Las Vegas, Nevada 89145 T: (702) 382-0200 F: (702) 382-0212 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 17	Plaintiff, v.) UNOPPOSED MOTION AND PROPOSED] ORDER TO EXTEND 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. 10161 Park Run Drive, Suite 150		
15		Las Vegas, Nevada 89145		
16		RUSS, AUGUST & KABAT Reza Mirzaie, Esq.		
17		Stanley H. Thompson, Jr., Esq. 12424 Wilshire Boulevard, 12th Floor		
18		Los Angeles, California 90025 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. 10161 PARK RUN DRIVE, SUITE 150 LAS VEGAS, NEVADA 89145 (702) 382-0200	2016-05-10-Unopposed Motion for Extension of Time.docx	2		

