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 Attorneys for Defendant
 7 Cobra Thermosolar Plants, Inc.

8 UNITED STATES DISTRICT COURT
 9 DISTRICT OF NEVADA

10 THE PRIVATE BANK AND TRUST
 COMPANY, a Delaware corporation,

Case No. 2:16-cv-00983-KJD-VCF

11 Plaintiff,

**STIPULATION AND
~~PROPOSED~~ ORDER TO
 RESPOND TO DISCOVERY**

12 v.

13 COBRA THERMOSOLAR PLANTS, INC., a
 14 Nevada corporation,

15 Defendant.

16
 17 COMES NOW, Defendant, COBRA THERMOSOLAR PLANTS, INC.
 18 (“Defendant”), by and through its counsel of record, Williams J. Wray, Esq., and Donna
 19 DiMaggio, Esq., of the law firm of HOLLEY DRIGGS WALCH FINE WRAY PUZEY
 20 & THOMPSON, and Plaintiff, THE PRIVATE BANK AND TRUST COMPANY
 21 (“Plaintiff”), by and through its counsel of record, Shan Davis, Esq., of the law firm of
 22 DAVIS/STIBOR, (Plaintiff and Defendant are hereinafter collectively referred to as
 23 “Parties”) and hereby agree and stipulate as follows:

24 Plaintiff propounded written discovery on Defendant on January 23, 2017, which
 25 included Requests for Production of Documents, Requests for Admission and
 26 Interrogatories. As such, responses to said written discovery was due on February 24,
 27 2017. The Parties are actively engaged in settlement discussions and wish to continue



1 said discussions without incurring the cost of litigation. As such, the Parties agree to
2 allow Defendant additional time to respond to the written discovery propounded by
3 Plaintiff. Therefore, it is agreed Defendant has up to and including March 7, 2017 to
4 respond to the written discovery propounded by Plaintiff.
5

6 DATED this 3rd day of March, 2017.

7 **HOLLEY DRIGGS WALCH FINE**
8 **WRAY PUZEY & THOMPSON**

9 /s/ Donna DiMaggio

10 _____
11 WILLIAM J. WRAY, ESQ.
12 Nevada Bar No. 5834
13 DONNA DIMAGGIO, ESQ.
14 Nevada Bar No. 9794
15 400 South Fourth Street, Third Floor
16 Las Vegas, Nevada 89101
17 Attorneys for Defendant
18 Cobra Thermosolar Plants, Inc.

DATED this 3rd day of March, 2017.

DAVIS/STIBOR

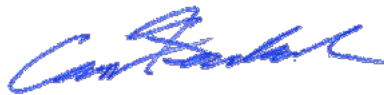
/s/ Shan Davis (esigned with permission)

SHAN DAVIS, ESQ.
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410 S. Rampart Blvd., Suite 390
Las Vegas, Nevada 89145
Attorneys for Plaintiff The Private
Bank and Trust

15 **ORDER**

16 IT IS SO ORDERED.

17 DATED: 3-6-2017
18 _____



19 **U.S. MAGISTRATE**

20 Respectfully submitted:

21 **HOLLEY DRIGGS WALCH**
22 **FINE WRAY PUZEY & THOMPSON**

23 /s/ Donna DiMaggio

24 _____
25 WILLIAM J. WRAY, ESQ.
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