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 Cobra Thermosolar Plants, Inc.

8 UNITED STATES DISTRICT COURT
 9 DISTRICT OF NEVADA

10 THE PRIVATE BANK AND TRUST
 11 COMPANY, a Delaware corporation,
 12 Plaintiff,
 13 v.
 14 COBRA THERMOSOLAR PLANTS, INC., a
 Nevada corporation,
 15 Defendant.
 16

Case No. 2:16-cv-00983-KJD-VCF
**STIPULATION AND
~~PROPOSED~~ ORDER TO
 RESPOND TO COMPLAINT**

17 COMES NOW, Defendant, COBRA THERMOSOLAR PLANTS, INC.
 18 (“Defendant”), by and through its counsel of record, William 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 filed a Complaint on May 2, 2016. The Parties are actively engaged in
 25 settlement discussions and wish to continue said discussions without incurring the cost of
 26 litigation. As such, the Parties agree to allow Defendant an open extension to respond to
 27 the Complaint.

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 FINE•WRAY•PUZEY•THOMPSON
 HDW

1 The Parties agree and stipulate that Defendant shall have an open extension to file
2 a response to the Complaint filed on May 2, 2016, to allow the Parties an opportunity to
3 resolve the matter.

4 The Parties further agree and stipulate that the requirements proscribed in F.R.C.P.
5 26 and LR 26-1 be tolled.

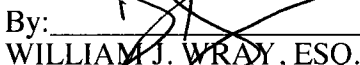
6 The Parties further agree and stipulate that should the Parties fail to resolve this
7 matter, Defendant shall have ten (10) days to file a response to the Complaint.

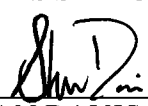
8 DATED this 5th day of July, 2016.

DATED this 5th day of July, 2016.

9 **HOLLEY DRIGGS WALCH**
10 **FINE WRAY PUZEY & THOMPSON**

DAVIS STIBOR

11 By: 
12 WILLIAM J. WRAY, ESQ.
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17 Las Vegas, Nevada 89101
18 *Attorneys for Defendant*
19 *Cobra Thermosolar Plants, Inc.*

By: 
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 Company

ORDER

IT IS SO ORDERED.
7-7-2016

DATED: _____



~~DISTRICT COURT JUDGE~~
U.S. Magistrate

HOLLEY DRIGGS WALCH
FINE WRAY PUZEY THOMPSON
HDW