

MCDONALD • CARANO • WILSON LLP
2300 WEST SAHARA AVENUE, SUITE 1200 • LAS VEGAS, NEVADA
PHONE (702)873-4100 • FAX (702) 873-9966

1 Craig A Newby, Esq. (NSBN 8591)
Joseph P. Schrage, Esq. (NSBN 11270)
2 **MCDONALD CARANO WILSON, LLP**
2300 West Sahara Avenue, Suite 1200
3 Las Vegas, NV 89102
Telephone: (702) 873-4100
4 Facsimile: (702) 873-9966
cnewby@mcwlaw.com
5 jschrage@mcwlaw.com

6 Michael C. Fee, Esq. (BBO No. 552796) (*pro hac vice*)
Dennis M. Lindgren, Esq. (BBO No. 648007) (*pro hac vice*)
7 **PIERCE & MANDELL, P.C.**
8 Beacon Street, Suite 800
Boston, MA 02108
9 Telephone: (617) 720-2444
Facsimile: (617) 720-3693
10 mfee@piercemandell.com
11 dennis@piercemandell.com

12 *Attorneys for Irving A. Backman, Irving A.*
Backman Associates, LLC and G&B Energy,
13 *Inc.*

14 **UNITED STATES DISTRICT COURT**
15 **DISTRICT OF NEVADA**

16 IRVING A BACKMAN, an individual;
17 IRVING A. BACKMAN & ASSOCIATES,
LLC, a Massachusetts limited liability
18 company; and G&B ENERGY, INC., a
Massachusetts corporation.

19 Plaintiff,

20 vs.

21 CHRISTOPHER M. GOGGIN, an individual;
22 and C2 ENGINEERING SERVICES, INC., a
North Carolina corporation.

23 Defendant.

Case No: 2:16-cv-01108-JCM-PAL

STIPULATION AND ORDER
EXTENDING TIME FOR PLAINTIFFS'
ANSWER TO COUNTERCLAIM

(First Request)

25 Pursuant to Local Rules IA 6-1, IA 6-2, and 7-1, plaintiffs Irving A. Backman, Irving A.
26 Backman & Associates and G&B Energy, Inc (collectively, "Plaintiffs") and defendants Christopher
27 M. Goggin and C2 Engineering Services, Inc. (collectively, "Defendants"), through their respective
28 undersigned counsel, hereby stipulate and agree to extend the deadline for Plaintiffs to answer or

1 otherwise respond to Defendant's Amended Counterclaim (ECF No. 26) from July 11, 2016 to **July**
2 **18, 2016**. ECR No. 26 was filed on June 23, 2016.

3 This is the first request by the parties. This stipulation is necessary because of the
4 unavailability of Plaintiffs' lead counsel and in order to allow sufficient time for Plaintiffs to gather
5 further facts necessary to respond to the Counterclaim. The undersigned represent that this
6 stipulation is not designed for purposes of delay.

7 DATED this 8 day of July, 2016.

8 McDONALD CARANO WILSON LLP

LEAH MARTIN LAW

9 By: /s/ Joseph P. Schrage
10 Craig A Newby, Esq. (NSBN 8591)
11 Joseph P. Schrage, Esq. (NSBN 11270)
12 2300 West Sahara Avenue, Suite 1200
13 Las Vegas, NV 89102
14 cnewby@mcwlaw.com
jschrage@mcwlaw.com
*Attorneys for Irving A. Backman, Irving
A. Backman Associates, LLC and G&B
Energy, Inc.*

By: /s/ Leah Martin
Leah Martin, Esq.
Rosalie Bordelove, Esq.
6671 S. Las Vegas Blvd.
Suite D-210
Las Vegas, NV 89119
lmartin@leahmartinlv.com
rbordelove@leahmartinlv.com
*Attorneys for Christopher M. Goggin and
C2 Engineering Services, Inc.*

15 GRANTED this ___ day of July, 2016

16 IT IS SO ORDERED.

17 
18 UNITED STATES MAGISTRATE JUDGE

19 DATED: July 20, 2016

20 Submitted by:

21
22
23 McDONALD CARANO WILSON LLP

24 /s/ Joseph P. Schrage
25 Craig A Newby, Esq. (NSBN 8591)
26 Joseph P. Schrage, Esq. (NSBN 11270)
27 2300 West Sahara Avenue, Suite 1200
28 Las Vegas, NV 89102
cnewby@mcwlaw.com
jschrage@mcwlaw.com
Attorneys for Irving A. Backman, Irving A. Backman Associates, LLC and G&B Energy, Inc.