1 Reza Mirzaie, Esq. (Pro Hac Vice to be submitted) 2 rmirzaie@raklaw.com Paul S. Kroeger, Esq. (Pro Hac Vice to be submitted) 3 pkroeger@raklaw.com 4 Stanley H. Thompson, Jr., Esq. (Pro Hac Vice to be submitted) 5 sthompson@raklaw.com C. Jay Chung, Esq. 6 (Pro Hac Vice to be submitted) jchung@raklaw.com 7 RUSS, AUGUST & KABAT 12424 Wilshire Boulevard, 12th Floor 8 Los Angeles, California 90025 Telephone: (310) 826-7474 9 Facsimile: (310) 826-6991 10 Mark Borghese, Esq. Nevada Bar No. 6231 11 mark@borgheselegal.com BORGHESE LEGAL, LTD. 12 10161 Park Run Drive, Suite 150 Las Vegas, Nevada 89145 13 T: (702) 382-0200 F: (702) 382-0212 14 Attorneys for Plaintiff 15 UNITED STATES DISTRICT COURT 16 DISTRICT OF NEVADA 17 2-WAY COMPUTING. INC.. Nevada) Case No.: 2:16-cv-01110-RCJ-PAL 18 corporation, 19 UNOPPOSED MOTION AND [PROPOSED] ORDER TO EXTEND 20 Plaintiff. DEADLINE FOR DEFENDANT TO RESPOND TO COMPLAINT 21 VS. (FIRST REQUEST) 22 GRANDSTREAM NETWORKS, INC., a 23 Delaware corporation,

Plaintiff 2-Way Computing, Inc. ("Plaintiff") hereby files this Unopposed Motion and [Proposed] Order to Extend Deadline for Defendant to Respond to the Complaint in accordance with LR IA 6-1 and LR IA 6-2. This is the first request to extend the proposed deadline. This request is not made after the response deadline which is currently June 27, 2016.

request is not made after the response deadline which is currently state 27, 2010

Defendant.

2016-06-27-Unopposed Motion for Extension.docx

BORGHESE LEGAL, LTD. 10161 PARK RUN DRIVE, SUITE 150 LAS VEGAS, NEVADA 89145

(702) 382-0200

24

25

26

27

28

1	The Complaint (Doc. 1) was filed on May 17, 2016 and was served on Grandstream	
2	Networks, Inc. on or about June 6, 2016. The current deadline to respond to the Complaint is	
3	June 27, 2016.	
4	The parties believe that the litigation of this matter will be best served by allowing an	
5	additional fifteen (15) days to discuss possible settlement of this matter and allow Defendant	
6	additional time to investigate the claims of the Complaint and obtain Nevada counsel. Because	
7	an attorney for Defendant has not made an appearance in this case, Plaintiff files this motion to	
8	extend Defendant's deadline as an unopposed motion.	
9	Accordingly, Plaintiff respectfully requests that this Court grant its request to continue	
10	the deadline for Defendant to respond to the Complaint until July 12, 2016.	
11		
12		BORGHESE LEGAL, LTD.
13		/s/ Mark Borghese
14	DATED: <u>June 27, 2016.</u>	Mark Borghese, Esq.
15		10161 Park Run Drive, Suite 150 Las Vegas, Nevada 89145
16		Russ, August & Kabat
17 18		Reza Mirzaie, Esq. Stanley H. Thompson, Jr., Esq. 12424 Wilshire Boulevard, 12th Floor
19		Los Angeles, California 90025 Attorneys for Plaintiff
20		
21	<u>ORDER</u>	
22	IT IS SO ORDERED.	
23	PEGGY A. LEEN UNITED STATES MAGISTRATE JUDGE	
24		
25		
26	DATED: July 1, 2016	
27	DATED: July 1, 2010	
28		