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12 **UNITED STATES DISTRICT COURT**
 13 **DISTRICT OF NEVADA**

14 MERIDIAN OHC PARTNERS, LP,
 15
 Plaintiff,
 16
 v.
 17
 18 CYANOTECH CORPORATION, a Nevada
 corporation; MICHAEL A. DAVIS, an
 individual; and RUDOLF STEINER
 19 FOUNDATION, INC. d/b/a RSF SOCIAL
 FINANCE, a New York corporation,
 20
 Defendants.

CASE NO.: 2:16-cv-01161-JAD-CWH
**STIPULATION AND ORDER FOR
 EXTENSION OF TIME TO SUBMIT
 RESPONSES AND REPLIES
 RELATING TO DEFENDANTS'
 MOTIONS TO DISMISS
 PLAINTIFF'S VERIFIED FIRST
 AMENDED COMPLAINT**
(First Request)

21 Pursuant to LR IA 6-1 and LR IA 6-2, Plaintiff Meridian OHC Partners, LP
 22 ("Meridian"), and Defendants Cyanotech Corporation ("Cyanotech"), Michael A. Davis
 23 ("Davis") and Rudolf Steiner Foundation, Inc. ("RSF") (and collectively, "Defendants"),
 24 hereby stipulate to extend the deadline for Meridian to respond to each of the following
 25 Motions to Dismiss filed by the Defendants on November 4, 2016: (1) Cyanotech's
 26 Motion to Dismiss Plaintiff's Derivative Claims (Dkt. No. 50); (2) RSF's Motion to
 27

1 Dismiss the Complaint (Dkt. No. 53); and (3) Davis’s Motion to Dismiss Pursuant to
2 Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6) (Dkt. 52) (collectively the
3 “Motions to Dismiss”). This is the first request for an extension of time for Meridian to
4 file responsive briefs.

5 The current deadline for Meridian to file responsive briefs to the Motions to
6 Dismiss is November 21, 2016. Meridian and the Defendants have stipulated to an
7 eighteen (18) day extension for Meridian to file responsive briefs to the Motions to
8 Dismiss, such that the deadline for filing responsive briefs will be December 9, 2016.
9 The Parties further stipulate and agree that Defendants’ reply briefs in support of the
10 Motions to Dismiss will be due December 22, 2016.

11 Meridian has requested additional time to file its response briefs, given that the
12 Motions to Dismiss raise complex issues and overlapping and intertwined arguments,
13 including joinders filed by one or more Defendants, which require material review and
14 may require Meridian to prepare three separate responsive briefs. Thus, Meridian
15 respectfully suggests that an eighteen (18) day extension is reasonable and that a good
16 faith position exists for this Court to grant the stipulation of the parties.

17 Dated this 11th day of November, 2016.

Dated this 11th day of November, 2016.

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OHC Partners, LP

1 Dated this 11th day of November, 2016.

Dated this 11th day of November, 2016.

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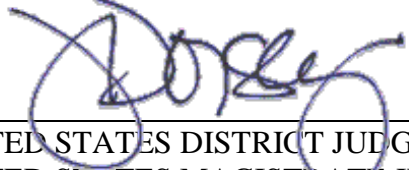
11 Attorneys for Defendant
Cyanotech Corporation

Attorneys for Defendant Michael A. Davis

14 **ORDER**

15 Having reviewed and considered the stipulation of the parties set forth above, and
16 good cause appearing, it is hereby ORDERED that Plaintiff Meridian OHC Partners, LP
17 shall have by and through December 9, 2016 to file responsive briefs to each of the
18 above-referenced Motions to Dismiss and joinders thereto, and Defendants have until
19 December 22, 2016 to file reply briefs in response thereto.

20 IT IS SO ORDERED.

21 
22 _____
23 UNITED STATES DISTRICT JUDGE/
24 ~~UNITED STATES MAGISTRATE JUDGE~~

25 DATED: 11/14/2016

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