

HOLLAND & HART LLP
9555 Hillwood Drive, 2nd Floor
Las Vegas, NV 89134

1 Robert J. Cassity
Nevada Bar No. 9779
2 David J. Freeman
Nevada Bar No. 10045
3 HOLLAND & HART LLP
9555 Hillwood Drive, 2nd Floor
4 Las Vegas, NV 89134
Phone: (702) 669-4600
5 Fax: (702) 669-4650
Email: bcassity@hollandhart.com
6 dfreeman@hollandhart.com

7 Thomas Sporkin (*Admitted Pro Hac Vice*)
Timothy J. Coley (*Admitted Pro Hac Vice*)
8 BUCKLEY SANDLER LLP
1250 24th Street NW, Suite 700
9 Washington DC 20037
Email: tsporkin@bucklesandler.com
10 tcoley@bucklesandler.com

11 Thomas E. Littler, Esq. (*Admitted Pro Hac Vice*)
341 W. Secretariat Dr.
12 Tempe, AZ 85284
Email: telittler@gmail.com

13 *Attorneys for Defendants Bruce J. Perlowin,*
14 *Barry K. Epling, Ferris Holding, Inc. and*
15 *Hobbes Equities Inc.*

16 **UNITED STATES DISTRICT COURT**
17 **DISTRICT OF NEVADA**

18 SECURITIES AND EXCHANGE
COMMISSION

19 Plaintiff,
20 v.

21 HEMP, INC. a Colorado Corporation; BRUCE
J. PERLOWIN, an individual; BARRY K.
22 EPLING, an individual; JED M. PERLOWIN,
an individual; FERRIS HOLDING, INC., a
23 private Nevada Corporation; HOBBS
EQUITIES INC., a private Nevada Corporation;
24 DIVERSIFIED INVESTMENTS LLC, a private
Nevada Limited Liability Company; and
25 QUANTUM ECONOMIC PROTOCOLS LLC,
a private Nevada Limited Liability Company,

26 Defendants.

Amy J. Oliver (Utah #8785)
admitted pro hac vice
OliverA@sec.gov
Daniel J. Wadley (Utah #10358)
admitted pro hac vice
WadleyD@sec.gov
James J. Thibodeau (Utah #15473)
admitted pro hac vice
ThibodeauJ@sec.gov
Salt Lake Regional Office
351 South West Temple
Suite 6.100
Salt Lake City, UT 84101-1950
Tel.: (801) 524-5796
Fax: (801) 524-3558

*Attorneys for Plaintiff Securities
and Exchange Commission*

CASE NO.: 2:16;-cv-01413-JAD-PAL

**JOINT STIPULATION AND ORDER TO
EXTEND RESPONSE AND REPLY
DEADLINES FOR (1) PLAINTIFF'S
MOTION FOR PARTIAL SUMMARY
JUDGMENT AGAINST DEFENDANTS
BARRY K. EPLING, FERRIS HOLDING,
INC. AND HOBBS EQUITIES, INC.
(ECF NO. 110); AND (2) PLAINTIFF'S
MOTION FOR PARTIAL SUMMARY
JUDGMENT AGAINST DEFENDANT
BRUCE J. PERLOWIN (ECF NO. 111)**

[FIRST REQUEST]

1 Pursuant to LR IA 6-1, Plaintiff and Certain Defendants,¹ by and through their attorneys
2 of record, stipulate as follows:

3 1. On December 13, 2017, Plaintiff filed two dispositive motions (the “Dispositive
4 Motions”): (1) a Motion for Partial Summary Judgment Against Defendants Barry K. Epling,
5 Ferris Holding, Inc. and Hobbes Equities, Inc. (ECF No. 110); and (2) a Motion for Partial
6 Summary Judgment Against Defendant Bruce J. Perlowin (ECF No. 111).

7 2. Under the Rules, the current deadline for Certain Defendants to respond to the
8 Dispositive Motions is January 3, 2018, and the current deadline for Plaintiff to file replies is
9 January 17, 2018.

10 3. The parties hereby seek an extension of the response deadlines for Dispositive
11 Motions until February 20, 2018, and until March 23, 2018 for the reply deadlines.

12 4. This is the parties’ first request for an extension of the response and reply deadlines
13 for the Dispositive Motions.

14 5. The reasons warranting additional time for the response and reply deadlines are as
15 follows:

- 16 a. Plaintiff has filed two Dispositive Motions against Certain Defendants, responses
17 for which become due immediately following the holidays.
- 18 b. Counsel for both parties will be traveling or otherwise unavailable during portions
19 of this period.
- 20 c. Already pending before the Court are motions for sanctions recently filed by
21 Plaintiff: (1) Motion for Imposition of Sanctions Against Defendants Barry K.
22 Epling, For Fabrication of Evidence and Against Defendants Barry K. Epling and
23 Bruce J. Perlowin for False Testimony (ECF No. 92); and (2) Motion for
24 Imposition of Sanctions Against Defendants Ferris Holdings, Inc., Barry K.
25 Epling, and Hobbes Equities, Inc. for Fabrication of Evidence (ECF No. 97).


26
27 ¹ “Certain Defendants” are those against whom Plaintiff’s Dispositive Motions [ECF Nos. 110
28 and 111] are directed: Bruce J. Perlowin, Barry K. Epling, Ferris Holding, Inc. and Hobbes
Equities Inc.

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These motions are set for hearing on February 1, 2018 (ECF No. 107). A resolution of these sanctions motions may affect the issues to be briefed by both parties in relation to the Dispositive Motions.

- d. In addition, two other dispositive motions are pending: (1) Defendants' July 14, 2017 Motion for Judgment on the Pleadings (ECF No. 66); and (2) Plaintiff's Aug. 9, 2017 Motion for Partial Summary Judgment (ECF No. 76). A resolution of those motions may likewise affect the issues to be briefed by both parties in relation to the Dispositive Motions.
- e. Thomas E. Littler, Counsel for Certain Defendants, is new to the case and will be participating in the preparation of the Dispositive Motions briefing. Additional time may be necessary for Mr. Littler to familiarize himself with the facts and issues raised by the Dispositive Motions in light of the holidays and his existing work load.
- f. Counsel for the SEC has no objection to Certain Defendants' request to extend the deadlines to respond to the Dispositive Motions. Counsel for the SEC also requests additional time to file the reply memorandums in support of the Dispositive Motions as agreed to and provided above.

IT IS SO ORDERED.



UNITED STATES DISTRICT JUDGE
Dated: December 20, 2017.

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IT IS SO STIPULATED.

DATED December 19, 2017.

/s/ Robert J. Cassity
Robert J. Cassity, Esq.
David J. Freeman, Esq.
HOLLAND & HART LLP
9555 Hillwood Drive, 2nd Floor
Las Vegas, Nevada 89134

Thomas A. Sporkin (*Pro Hac Vice*)
Timothy J. Coley (*Pro Hac Vice*)
BUCKLEY SANDLER, LLP
1250 24th Street NW, Suite 700
Washington DC 20037

Thomas E. Littler, Esq. (*Pro Hac Vice*)
341 W. Secretariat Dr.
Tempe, AZ 85284

*Attorneys for Defendants Bruce J. Perlowin,
Barry K. Epling, Ferris Holding, Inc. and
Hobbes Equities Inc.*

/s/ Amy J. Oliver
Amy J. Oliver (Utah #8785)
admitted pro hac vice
OliverA@sec.gov
Daniel J. Wadley (Utah #10358)
admitted pro hac vice
WadleyD@sec.gov
James J. Thibodeau (Utah #15473)
admitted pro hac vice
ThibodeauJ@sec.gov
Salt Lake Regional Office
351 South West Temple
Suite 6.100
Salt Lake City, UT 84101-1950
Tel.: (801) 524-5796
Fax: (801) 524-3558

*Attorneys for Plaintiff Securities
and Exchange Commission*

ORDER

IT IS SO ORDERED.

U.S. DISTRICT/MAGISTRATE JUDGE

DATED: _____