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UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

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

Defendants.

Case No. 2:16-cv-1413 JAD-PAL

STIPIULATED MOTION TO AMEND THE SCHEDULING ORDER (Second Request) Plaintiff, Securities and Exchange Commission (the "Commission"), hereby moves the Court to amend the previously entered Scheduling Order (Docket No. 40) and Amended Scheduling Order (Docket No. 58) by extending the dates for fact and expert discovery and for dispositive motions. Defendants Hemp, Inc., Bruce J. Perlowin, Barry K. Epling, Jed M. Perlowin, Ferris Holding, Inc., Hobbes Equities, Inc., Diversified Investments, LLC, and Quantum Economic Protocols, LLC, through their respective counsel, have all stipulated to the Plaintiff's motion. This is the second stipulation for a motion to amend the scheduling order.

The reasons for this Motion are as follows. The parties are actively engaged in discovery, including the exchange of written discovery and the taking of numerous depositions. The discovery responses and deposition testimony are necessary for the parties' respective expert reports, but will not be available in time for the experts to adequately incorporate them into their reports. Were the parties to maintain the current schedule for expert discovery, it would necessitate supplemental reports from experts and cause the parties to incur additional time and expense. Moving the fact and expert deadlines would also necessitate allowing time for expert depositions after the exchange of expert reports as well as moving the deadline for the filing of dispositive motions so that the parties may have the benefit of completing expert discovery before the dispositive motion deadline.

Therefore, the parties have stipulated to move the following deadlines as set forth below:

- 1. Fact Discovery Deadline: July 17, 2017.
- 2. Plaintiff's expert report(s) due on July 17, 2017.
- 3. Defendants' expert report(s) due on August 16, 2017.
- 4. Discovery deadline for expert depositions on September 29, 2017.
- 5. Dispositive motion deadline on November 13, 2017.

IT IS SO STIPULATED.

Dated: May 2, 2017	s/Daniel J. Wadley Amy J. Oliver Daniel J. Wadley James J. Thibodeau Attorneys for Plaintiff
	Securities and Exchange Commission
Dated: May 2, 2017	s/Jonathan D. Bletzacker Brent R. Baker Jonathan D. Bletzacker Attorney for Jed Perlowin, Diversified Investments LLC, Quantum Economic Protocols LLC
Dated: May 2, 2017	s/Timothy J. Coley Thomas A. Sporkin Timothy J. Coley Attorney for Bruce Perlowin, Hemp Inc., Barry Epling, Ferris Holding, Inc., Hobbes Equities Inc.
	IT IS SO ORDERED.
	HONORABLE PEGGY A. LEEN UNITED STATES MAGISTRATE JUDGE

DATED: May 5, 2017

CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of May, 2017, I served **STIPIULATED MOTION**

TO AMEND THE SCHEDULING ORDER (Second Request) to the following parties

entitled to service via the Court's ECF system to the counsel indicated below:

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/s/ Kenji Kawa