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31 **UNITED STATES DISTRICT COURT**
32 **FOR THE DISTRICT OF NEVADA**

33 **SECURITIES AND EXCHANGE**
34 **COMMISSION,**

35 Case No.: 2:16-cv-1413

36 Plaintiff,

37 vs.

38 HEMP, INC. a Colorado Corporation;
39 BRUCE J. PERLOWIN, an individual;
40 BARRY K. EPLING, an individual; JED
41 M. PERLOWIN, an individual; FERRIS
42 HOLDING, INC., a private Nevada
43 Corporation; HOBBES EQUITIES INC.,
44 a private Nevada Corporation;
45 DIVERSIFIED INVESTMENTS LLC, a
46 private Nevada Limited Liability
47 Company; and QUANTUM ECONOMIC
48 PROTOCOLS LLC, a private Nevada
49 Limited Liability Company.

50 Defendants.

51 **JOINT STIPULATION AND ORDER TO**
52 **EXTEND RESPONSE AND REPLY**
53 **DEADLINES FOR PLAINTIFF'S MOTION IN**
54 **LIMINE AND PLAINTIFF'S MOTION FOR**
55 **IMPOSITION OF SANCTIONS**

56 **(FIRST REQUEST)**

1 Pursuant to LR IA 6-1, Plaintiffs and Certain Defendants¹ herein, by and through their
2 attorneys of record, stipulate as follows:

3 1. Plaintiff filed a Motion in Limine to Exclude Defendants' Expert Salli Marinov
4 (Docket No. 91) on Monday, October 23, 2017 ("Motion in Limine") and a Motion for
5 Imposition of Sanctions Against Barry K. Epling for Fabrication of Evidence and Against
6 Defendant's Barry K. Epling and Bruce J. Perlwin for False Testimony (Docket No. 92) on
7 Thursday, October 26, 2017 ("Sanctions Motion").

8 2. Under the Rules, the current deadline for Defendants' response to the Motion in
9 Limine is November 6, 2017, the current deadline for Defendant's response to the Sanctions
10 Motion is November 9, 2017, and the current deadline for Plaintiff to file a Reply in support of
11 the Sanctions Motion is November 24, 2017.

12 3. The parties hereby seek an extension of the response deadline to both the Motion in
13 Limine and the Sanctions Motion until November 20, 2017, and until December 20, 2017 for the
14 reply deadline.

15 4. Certain Defendants shall file a response to the Motion in Limine and the Sanctions
16 Motion on or before November 20, 2017; and

17 5. Plaintiff shall file a reply to the Sanctions Motion on or before December 11, 2017.

18 6. This is the parties' first request for an extension of the response and reply
19 deadlines for both motions. The reasons warranting additional time for the response and reply
20 deadlines are as follows:

21 a. The extension of time would allow Defendants additional time to respond to
22 the Motion in Limine and Sanctions Motion, whose briefing schedules
23 currently overlap; and

b. The extension of time would allow Plaintiff additional time to reply in support of its Sanctions motion to avoid a conflict with the Thanksgiving holiday.

7. Counsel for the parties have conferred regarding these requested extensions, as

well as the reasons supporting the requested extensions, and they agree that the requested extensions are an appropriate and efficient means of resolving the parties' scheduling and briefing concerns.

IT IS SO STIPULATED

DATED October 27th, 2017.

/s/ Robert J. Cassity, _____
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ORDER

IT IS SO ORDERED.

Terry A. Steen

CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of October, 2017, I served **JOINT STIPULATION AND ORDER TO EXTEND RESPONSE AND REPLY DEADLINES FOR PLAINTIFF'S MOTION IN LIMINE AND PLAINTIFF'S MOTION FOR IMPOSITION OF SANCTIONS (FIRST REQUEST)** to the following parties entitled to service by via email to the counsel indicated below:

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