

1 CLARK THIEL (Nevada Bar No. 10778)
 MICHAEL S. MCNAMARA (*Pro Hac Vice*)
 2 **PILLSBURY WINTHROP SHAW**
PITTMAN LLP
 3 Four Embarcadero Center, 22nd Floor
 San Francisco, CA 94111-5998
 4 Telephone: 415.983.1000
 Facsimile: 415.983.1200
 5 E-mail: clark.thiel@pillsburylaw.com
michael.mcnamara@pillsburylaw.com

6
 7 SHEMILLY BRISCOE
 Nevada Bar No. 9985
BRISCOE LAW GROUP
 8 1060 Wigwam Parkway
 Henderson, Nevada 89074
 9 Telephone: 702.754.5600
 E-mail: shemilly@briscoelawgroup.com

10
 11 JOSE M. PIENKNAGURA (*Pro Hac Vice*)
HUNT CONSTRUCTION GROUP, INC.
 7720 N. 16th Street, Ste 100
 12 Phoenix, AZ 85020
 Telephone: 480.368.4700
 13 E-mail: jose.pienknagura@aecom.com

14 *Counsel for Hunt/PENTA and Insurance*
Partners, Inc.

15
 16 **UNITED STATES DISTRICT COURT**
 17 **DISTRICT OF NEVADA**

18 HUNT/PENTA, a Joint-Venture of HUNT
 CONSTRUCTION GROUP, INC., and PENTA
 19 BUILDING GROUP, LLC,

20 Plaintiffs,

21 v.

22 AON RISK SERVICES SOUTH, INC., and
 23 Does 1-50, inclusive,

24 Defendants.

25 AND RELATED MATTERS.

Case No.: 2-16-cv-01563-JAD-NJK

Removed Case No.: A-16-736809-C

**UNOPPOSED MOTION TO EXTEND
 TIME TO RESPOND TO AON'S
 OMNIBUS MOTION IN LIMINE**

26 Plaintiffs HUNT/PENTA (“Plaintiffs”) respectfully submit this Unopposed Motion to
 27 Extend Time to Respond to Defendant Aon’s (“Defendant”) Omnibus Motion in Limine filed on
 28 August 13, 2018 [Doc. No. 87]. Defendant has consented to an extension to and including

1 August 30, 2018, but will not agree to any further extension.

2 **BACKGROUND**

3 Discovery is complete. As documented in Aon's Omnibus Motion in Limine ("Motion"),
4 counsel attempted to stipulate and agree to issues, but those negotiations did not end in an
5 agreement. Lead counsel's international travel obligations have made him unavailable. As a
6 result, lead counsel has not had adequate time to review the matter, advise the clients and prepare
7 a responsive pleading.

8 **REASONS FOR GRANTING THE REQUESTED EXTENSION**

9 On August 13, 2018, Defendant filed its Motion. This Unopposed Motion moves the
10 Court to grant a motion to extend the time in which to file a responsive pleading for good cause.
11 *See* Fed. R. Civ. P 6(b)(1).

12 The Plaintiffs' lead counsel needs adequate time to review the matter, advise the clients
13 and respond, but counsel is out of the country until August 27, 2018 in Africa. The parties had
14 previously agreed to stipulate, but that did not come to fruition despite efforts. Therefore,
15 Plaintiffs requested additional time to respond and Defendant agreed they would not oppose an
16 extension until August 30, 2018. Accordingly, the Plaintiffs respectfully request an extension to
17 respond to Defendant's Motion.

18 Pursuant to Local Rule 16-3, lead counsel verbally discussed the requested extension
19 with Defendant's counsel. As the Motion outlines, a good amount of diligence was put towards
20 resolving issues without filing additional motions. The parties are willing to agree to an
21 extension until August 30, 2018, but would not agree to any additional time. Failing to grant an
22 extension would leave lead counsel with insufficient time to review the matter, consult with the
23 clients and prepare a responsive pleading or motion. Further, this short extension will not
24 prejudice Defendant.

25 WHEREFORE, the Plaintiffs respectively request that the Court grant its Unopposed
26 Motion for an extension of time up to and including August 30, 2018 to file a responsive
27 pleading to Defendant's Motion. A proposed Order providing for this extension is submitted
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

with this Motion.

Dated: Aug. 15, 2018

Respectfully submitted,

**BRISCOE LAW GROUP
PILLSBURY WINTHROP SHAW PITTMAN LLP
HUNT CONSTRUCTION, INC.**

S. Briscoe

Shemilly Briscoe (Nevada Bar No. 9985)
Clark Thiel (Nevada Bar No. 10778)
Michael S. McNamara (*Pro Hac Vice*)
Jose Pienknagura (*Pro Hac Vice*)

Counsel for Plaintiff

1 CLARK THIEL (Nevada Bar No. 10778)
MICHAEL S. MCNAMARA (*Pro Hac Vice*)
2 **PILLSBURY WINTHROP SHAW**
PITTMAN LLP
3 Four Embarcadero Center, 22nd Floor
San Francisco, CA 94111-5998
4 Telephone: 415.983.1000
Facsimile: 415.983.1200
5 E-mail: clark.thiel@pillsburylaw.com
michael.mcnamara@pillsburylaw.com

6
7 **SHEMILLY BRISCOE**
Nevada Bar No. 9985
BRISCOE LAW GROUP
8 1060 Wigwam Parkway
Henderson, Nevada 89074
9 Telephone: 702.754.5600
E-mail: shemilly@briscoelawgroup.com

10
11 **JOSE M. PIENKNAGURA (*Pro Hac Vice*)**
HUNT CONSTRUCTION GROUP, INC.
7720 N. 16th Street, Ste 100
12 Phoenix, AZ 85020
Telephone: 480.368.4700
13 E-mail: jose.pienknagura@aecom.com

14 *Counsel for Hunt/PENTA and Insurance*
Partners, Inc.

15
16 **UNITED STATES DISTRICT COURT**
17 **DISTRICT OF NEVADA**

18 HUNT/PENTA, a Joint-Venture of HUNT
CONSTRUCTION GROUP, INC., and PENTA
19 BUILDING GROUP, LLC,

20 Plaintiffs,

21 v.

22 AON RISK SERVICES SOUTH, INC., and
23 Does 1-50, inclusive,

24 Defendants.

25 AND RELATED MATTERS.

Case No.: 2-16-cv-01563-JAD-NJK

Removed Case No.: A-16-736809-C

ORDER

26 Upon consideration of the Unopposed Motion to Extend Time to Respond to Defendant
27 Aon's Omnibus Motion in Limine, it is hereby:

28 ORDERED that the Plaintiffs' Unopposed Motion to Extend Time to Respond to

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Defendant Aon's Omnibus Motion in Limine is hereby granted; and it is further
ORDERED that the Plaintiffs have until August 30, 2018 to file a responsive pleading to
Defendant Aon's Omnibus Motion in Limine.

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

Dated: August 16, 2018