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6 *Attorneys for Plaintiff and Counterdefendant*  
 7 *Harlan Stratton and Plaintiff O.E.M. Trailers, LLC*

8 **UNITED STATES DISTRICT COURT**  
 9 **DISTRICT OF NEVADA**

10 HARLAN STRATTON, an individual;  
 11 O.E.M. Trailers, LLC. an Arizona limited  
 liability company, inclusive,  
 12  
 Plaintiffs,  
 13  
 vs.  
 14 VINCE WEBB, an individual; TRAILERS  
 15 INTL, LLC, a Nevada limited liability company;  
 RNO EXHIBITIONS, LLC, a Nevada limited  
 16 liability company, inclusive,  
 Defendants.  
 17  
 TRAILERS INTL LLC, a Nevada limited  
 18 liability company,  
 19  
 Counterclaimant,  
 20  
 vs.  
 21 HARLAN STRATTON, an individual,  
 22  
 Counterdefendant.  
 23

Case No. 2:16-cv-01565-JAD-GWF

**STIPULATION AND ORDER TO  
 EXTEND THE TIME FOR PLAINTIFF  
 HARLAN STRATTON TO ANSWER  
 OR OTHERWISE RESPOND TO  
 DEFENDANT TRAILERS INTL  
 LLC’S COUNTERCLAIM AND TO  
 EXTEND THE TIME FOR SUBMISSION  
 OF THE PARTIES’ PROPOSED  
 DISCOVERY PLAN AND SCHEDULING  
 ORDER**

(First Request)

24 Plaintiff Harlan Stratton and Plaintiff O.E.M. Trailers, LLC (together “Plaintiffs”) on the  
 25 one hand, and Defendants Vince Webb, Trailer Intl LLC, and RNO Exhibitions, LLC (together,  
 26 “Defendants”), on the other hand, state the following:

- 27 1. The Complaint in this action was filed on July 1, 2016. (*See* ECF No. 1.)
- 28 2. After obtaining an extension of time from Mr. Stratton, Defendant Trailers Intl LLC

1 served its Answer and Counterclaim on August 16, 2016. (*See* ECF Nos. 8, 9, 12.)

2 3. Mr. Stratton’s answer or other response to the Counterclaim is presently due on  
3 September 9, 2016.

4 4. The parties’ principals are presently engaged in settlement discussions.

5 5. To facilitate settlement discussions, and not for the purpose of creating any  
6 unnecessary delay in these proceedings, the parties agree to extend the deadline for Mr. Stratton to  
7 serve his Answer to the Counterclaim by thirty (30) days, from September 9, 2016 to October 9,  
8 2016.

9 6. In addition, pursuant to LR 26-1, the parties have thirty (30) days “after the first  
10 defendant answers or otherwise appears” to conduct a Fed. R. Civ. P. 26(f) discovery planning  
11 conference, and fourteen days thereafter to submit a proposed discovery plan and scheduling order.  
12 *Id.*; Fed. R. Civ. P. 26(f)(2). The Defendants appeared on August 16, 2016 when they filed their  
13 answers. (*See* ECF Nos. 10-12.) Under the federal and local rules, the parties have until September  
14 15, 2016 to conduct a Rule 26(f) discovery planning conference and until September 29, 2016 to  
15 file a proposed discovery plan and scheduling order.

16 7. To further facilitate settlement discussions, and not for the purpose of creating any  
17 unnecessary delay in these proceedings, the parties agree to extend the present deadline for  
18 conducting a Rule 26(f) discovery planning conference by thirty (30) days, from September 15,  
19 2016 to October 15, 2016, and extend the deadline for submission of a Rule 26(f) report and  
20 proposed discovery plan and scheduling order by thirty (30) days, from September 29, 2016 to  
21 October 31, 2016.

22 **IT IS SO AGREED AND STIPULATED:**

23 LEWIS ROCA ROTHGERBER  
24 CHRISTIE LLP

FENNEMORE CRAIG, P.C.

25 By: /s/ Jonathan W. Fountain  
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By: /s/ Leslie Bryan Hart  
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*Attorneys for Defendants Vince Webb and RNO*  
*Exhibitions, LLC and Defendant and*  
*Counterclaimant Trailers Intl LLC*

11 **IT IS SO ORDERED:**

13   
14 \_\_\_\_\_  
15 UNITED STATES MAGISTRATE JUDGE

16 DATED: September 12, 2016

1 CERTIFICATE OF SERVICE

2 I hereby certify that on September 8, 2016, I caused a true and accurate copy of the  
3 foregoing document entitled, STIPULATION AND ORDER TO EXTEND THE TIME FOR  
4 PLAINTIFF HARLAN STRATTON TO ANSWER OR OTHERWISE RESPOND TO  
5 DEFENDANT TRAILERS INTL LLC'S COUNTERCLAIM AND TO EXTEND THE TIME FOR  
6 SUBMISSION OF THE PARTIES' PROPOSED DISCOVERY PLAN AND SCHEDULING  
7 ORDER (First Request), to be filed with the Clerk of the Court via the Court's CM/ECF system,  
8 which will send/sent an electronic copy of the same to the following counsel of record:

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21 *Attorneys for Defendants Vince Webb and RNO*  
22 *Exhibitions, LLC and Defendant and*  
23 *Counterclaimant Trailers Intl LLC*

24 Dated: this 8th day of September, 2016.

25 /s/ Jonathan W. Fountain  
26 An employee of Lewis Roca Rothgerber Christie LLP  
27  
28