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8	UNITED STATES I	DISTRICT COURT
9	DISTRICT O	DF NEVADA
10		
11	LHF PRODUCTIONS, INC., a Nevada	Case No.: 2:16-cv-02028-JAD-NJK
12	2 Corporation,	
13	Plaintiff,	STIPULATION AND ORDER TO EXTEND
14	VS.	DEFENDANT'S DEADLINE TO RESPOND TO THE PLAINTIFF'S MOTION TO
15	BRIAN KABALA, an individual.	DISMISS
16	Defendants.	[SECOND REQUEST]
17		
18	And related counter-claims	
19		
20	COMES NOW Plaintiff LHF PRC	DUCTIONS, INC. ("Plaintiff") and Defendant
21	BRIAN KABALA ("Defendant"), by and through	h their respective counsel of record, and hereby
22	stipulate and agree to extend the time by which	the Defendant must respond to the Plaintiff's
23	pending Motion to Dismiss the Defendant's Amer	nded Counter-Claims, filed on February 9, 2018
24	[ECF No. 120] (the "Motion to Dismiss"), agreein	g as follows:
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	-1- STIPULATION TO EXTEND DEADLINE	TO RESPOND TO MOTION TO DISMISS
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1	PROCEDURAL BACKGROUND	
2	1. On February 9, 2018, Plaintiff filed its Motion to Dismiss. Per the Court's	
3	February 21, 2018 Minute Order (ECF No. 121), Defendant's response is due by February 26,	
4	2018.	
5	2. The Plaintiff and Defendant now hereby stipulate to extend the deadline for the	
6	Defendant to respond to the Motion to Dismiss to Monday, March 12, 2018.	
7	3. This is the <u>Second Request</u> for an extension of this deadline; the parties	
8	submitted a stipulation yesterday with an identical request (ECF No. 122); however, the Court	
9	denied the request without prejudice , because it had been submitted concurrently in the same	
10	filing as a request to extend another briefing deadline.	
11	4. This request is made in good faith and not made for the purpose of undue delay.	
12	GOOD CAUSE STATEMENTS	
13	5. Defendant seeks additional time to respond to the Motion to Dismiss, noting that	
14	Defendant's lead counsel, Lisa Clay, Esq., was on a pre-planned vacation out of the country at	
15	the time of the filing of the Motion to Dismiss and will not return until February 15, 2018.	
16	Based on Counsel will need additional time to review the Motion to Dismiss and craft an	
17	Opposition.	
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	-2- STIPULATION TO EXTEND DEADLINE TO RESPOND TO MOTION TO DISMISS	

1	WHEREFORE, subject to the Court's approval below, Plaintiff LHF PRODUCTIONS,	
2	INC. and Defendant BRIAN KABALA hereby stipulate and agree to extend the deadline for the	
3	Defendant to respond to the Motion to Dismiss from Monday, February 26, 2018 to Monday,	
4	March 12, 2018, and Plaintiff's deadline to file its Reply brief be similarly extended.	
5	Respectfully submitted February 14, 2018	
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7	HAMRICK & EVANS LLP KOLESAR & LATHAM	
8	/s/ Charles C. Rainey	
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12	Attorney for Plaintiff,Attorney for Defendant,LHF Productions, Inc.Brian Kabala	
13	ORDER	
14	Based on the parties' stipulation [ECF No. 125] and good cause appearing, IT IS HEREBY	
15	ORDERED that the deadline for the Defendant to respond to the Plaintiff's pending Motion to	
16	Dismiss is hereby extended to Monday, March 12, 2018, and Plaintiff's deadline to file its Reply	
17	brief is hereby similarly extended.	
18	IT IS SO ORDERED.	
19	Dated: February 21, 2018.	
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21	XDR45	
22	UNITED STATES DISTRICT JUDGE	
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	-3- STIPULATION TO EXTEND DEADLINE TO RESPOND TO MOTION TO DISMISS	
	STIL OF TO EXTERD DEADLINE TO RESPOND TO MOTION TO DISMISS	