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14	UNITED STATES D	ISTRICT COURT
14	DISTRICT O	F NEVADA
15	DISTRICT O	FREVADA
	* *	*
16	LHF PRODUCTIONS, INC., a Nevada	CASE NO. 2:16-cv-02028-JAD-
	Corporation,	
17	Plaintiff,	STIPULATION AND ORD
	VS.	EXTEND BRIEFING DEAD
18		ON PLAINTIFF LHF
	AGUSTIN BERTOLIN, an individual; MARIA	PRODUCITONS, INC.'s MO
19	GONZALEZ, an individual; BRIAN KABALA,	TO VOLUNTARILY DISMIS
	an individual; JOHN KOEHLY, an individual;	PREJUDICE ITS CLAIMS A
20	DANIEL O'CONNELL, an individual;	BRIAN KABALA [ECF No. 1
<u>,</u> ,	DONALD PLAIN, an individual; DAVID	MOTION TO DISMIS
21	POOR, an individual: ANTE SODA, an	DEFENDANT BRIAN KAB

POOR, an individual; ANTE SODA, an individual; MATTHÉW STEWART, an individual; AARON TAKAHASHI, an individual; and JOHN AND JANE DOES, 1-10,

Defendants.

Counter-Plaintiff,

BRIAN KABALA, an individual,

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27 LHF PRODUCTIONS, INC., a Nevada Corporation, 28

Counter-Defendant.

-NJK

ER TO **LINES** OTION SS WITH **GAINST 74] AND DEFENDANT BRIAN KABALA'S DECLARATORY JUDGMENT** COUNTERCLAIM FOR LACK OF SUBJECT MATTER JURISDICTION [ECF No. 175]

[FIRST REQUEST]

[ECF No. 176]

VS.

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STIPULATION AND ORDER TO EXTEND BRIEFING DEADLINES ON PLAINTIFF LHF PRODUCITONS, INC.'s MOTION TO VOLUNTARILY DISMISS WITH PREJUDICE ITS CLAIMS AGAINST BRIAN KABALA [ECF No. 174] AND MOTION TO DISMISS DEFENDANT BRIAN KABALA'S DECLARATORY JUDGMENT COUNTERCLAIM FOR LACK OF SUBJECT MATTER JURISDICTION [ECF No. 175]

## [FIRST REQUEST]

COMES NOW Plaintiff LHF PRODUCTIONS, INC. ("LHF" or "Counter-Defendant") and Defendant BRIAN KABALA ("Kabala" or "Counter-Plaintiff"), by and through their respective counsel of record, and hereby stipulate and agree to extend the time for Kabala to file responses to LHF's Motion to Voluntarily Dismiss With Prejudice its Claims Against Brian Kabala [ECF No. 174] and LHF's Motion to Dismiss Defendant Brian Kabala's Declaratory Judgment Counterclaim for lack of Subject Matter Jurisdiction [ECF No. 175], (the "Motions to Dismiss"), agreeing as follows:

- 1. On August 13, 2018, LHF filed the above referenced Motions to Dismiss (ECF. Nos. 174 and 175). Per LR 7-2 Kabala's responses are due by August 27, 2018.
- 2. LHF and Kabala now hereby stipulate to extend the deadline for Kabala to respond to the Motions to Dismiss to September 6, 2018.
- 3. The deadline for LHF to file its reply briefs, if any, shall be similarly extended by ten days, from September 7, 2018, to September 17, 2018.
  - 4. This is the **First Request** for an extension on these deadlines.
- 5. This request is made for good cause, in good faith, and not made for the purpose of undue delay. Neither party will be prejudiced by the requested extension.

## **GOOD CAUSE STATEMENTS**

6. Kabala seeks additional time to respond to the Motions to Dismiss, noting that the Motions to Dismiss were filed on August 13, 2018, the day Defendant's lead counsel, Lisa Clay, Esq., returned to the office from vacation. Upon her return, she has been preparing for two major depositions in this case, set to take place on August 29, 2018 and August 30, 2018. She is also in the final stages of finalizing two time-sensitive motions in this case. Preparing for these depositions, as well as finalizing these two motions, in addition to work in an estimated 15 other

Motions to Dismiss is hereby	extended to	September	6,	2018,	and	LHF'	S	deadline	to	file	its
Reply briefs is hereby similarly	y extended to	September	17,	2018.							

## IT IS SO ORDERED.

DATED this _	21	_day of _	August	, 2018.
				Moder

UNITED STATES DISTRICT JUDGE