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20 Attorneys for defendants Richard Marchitto, and
 21 Richard Marc Gallery, LLC

22 UNITED STATES DISTRICT COURT

23 DISTRICT OF NEVADA

24 PETER LIK, an individual, and PETER LIK
 IP COMPANY, LLC, a Nevada limited
 25 liability company,

26 Plaintiffs,

27 v.

28 RICHARD MARCHITTO, an individual,

CASE NO. 2:16-cv-02200-RFB-NJK

**JOINT STIPULATION TO EXTEND
 DEADLINE FOR PLAINTIFFS TO FILE
 CONSOLIDATED OPPOSITION TO
 DEFENDANTS' MOTIONS FOR
 SUMMARY JUDGMENT**

(FIRST REQUEST)

1 RICHARD MARC GALLERY LLC, a
2 Nevada limited liability company, and DOES
1-10, inclusive.

3 Defendants.

4 Plaintiffs Peter Lik and Peter Lik IP Company, LLC (“plaintiffs”) and defendants
5 Richard Marchitto and Richard Marc Gallery LLC (“defendants”) jointly submit the following
6 stipulation to extend the deadline for plaintiffs to file a consolidated opposition to defendants’
7 motion for partial summary judgment (ECF No. 36), currently due on April 18, 2017, and
8 defendants’ motion for partial summary judgment on plaintiffs’ Lanham Act claims (ECF No.
9 37), currently due on April 19, 2017, for fourteen (14) days to May 2, 2017, pursuant to LR IA 6-
10 1:

11 **I. Local Rule 6-1**

12 Under LR IA 6-1(a), every stipulation to extend time must inform the Court of any
13 previous extensions granted and state the reason for the extension requested.

14 **A. The Requirements of Local Rule IA 6-1 Are Satisfied.**

15 This is the first request for an extension of the deadline for plaintiffs to file a consolidated
16 opposition to defendants’ summary judgment motions. The parties have agreed in principle to a
17 settlement that will dispose of this litigation in its entirety and are currently negotiating the terms
18 of a written settlement agreement. This extension is requested to allow the parties to finalize
19 their negotiations and the written settlement agreement, and avoid unnecessary litigation costs
20 and waste of judicial resources that would otherwise be invested during the requested fourteen
21 (14) day extension.

22 Accordingly, the parties jointly request as follows:

23 1. The deadline for plaintiffs to file a consolidated opposition to defendants’ motion
24 for partial summary judgment (ECF No. 36), currently due on April 18, 2017, and defendants’
25 motion for partial summary judgment on plaintiffs’ Lanham Act claims (ECF No. 37), currently
26 due on April 19, 2017, is hereby extended for fourteen (14) days to May 2, 2017.

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Dated: April 12, 2017

LATHAM & WATKINS LLP

By /s/Robert J. Ellison
Robert J. Ellison
Attorneys for plaintiffs Peter Lik and
Peter Lik IP Company, LLC

Dated: April 12, 2017

MARQUIS AURBACH COFFING

By /s/Liane K. Wakayama
Liane K. Wakayama
Attorneys for defendants Richard Marchitto
and Richard Marc Gallery LLC

IT IS SO ORDERED.



DATED: April 13, 2017