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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

16 GVCL VENTURES, INC., a corporation,
17
Plaintiff,

18 vs.

19 GOPETFRIENDLY.COM, LLC, a limited
20 liability company; DOES I-X inclusive; and
ROE CORPORATIONS XX-XXX, inclusive,

21 Defendants,

22
23 GOPETFRIENDLY.COM, LLC, a limited
liability company,

24 Counterclaim-plaintiff,

25 v.

26 GVCL VENTURES, INC., a Delaware
27 corporation; REGISTERED EXPRESS
CORPORATION, a Nevada corporation;
28 REGISTERED EXPRESS

Case Number: 2:16-cv-02892

**STIPULATION AND ORDER TO
EXTEND DISCOVERY AND CASE
SCHEDULING DEADLINES**

(FIRST REQUEST)

1 INTERNATIONAL CORPORATION, a
2 Nevada corporation; PROACTIVE PET
3 PRODUCTS, INC., a Nevada corporation;
4 DIGITAL AIRO, INC., a Nevada
5 corporation; JOHN TAYLOR, an individual;
6 MIKE DILLON, an individual; GERALD
7 NEZIOL, an individual; DOES I-X, inclusive;
8 and ROE CORPORATIONS I-X, inclusive,

Counterclaim-defendants.

9 Pursuant to Local Rule 26-4, plaintiff and counterclaim-defendant GVCL Ventures, Inc.
10 (“GVCL”) and counterclaim-defendant Gerald Neziol (“Neziol”), through their counsel of
11 record, the Law Office of Shawn Perez, and defendant and counterclaim-plaintiff
12 GoPetFriendly.com, LLC (“GoPetFriendly”), through its counsel of record, the law firm of
13 Marquis Aurbach Coffing, respectfully submit the following Stipulation and Order to Extend
14 Discovery and Case Scheduling Deadlines (First Request). This Stipulation is being entered in
15 good faith and not for purposes of delay.

16 **I. DISCOVERY COMPLETED**

- 17 • On January 23, 2018, GoPetFriendly served its initial disclosures;
- 18 • On February 16, 2018, GoPetFriendly issued and served subpoenas on two third
19 parties, the Law Office of Thomas Cook, Ltd., and the Law Office of Ottie Akers;
- 20 • On February 20, 2018, GoPetFriendly served its first request for production of
21 documents upon GVCL;
- 22 • On March 15, 2018, GoPetFriendly issued and served subpoenas on two third
23 parties, Interserver, Inc., and Namecheap; and
- 24 • On April 23, 2018, GVCL and Neziol served their initial disclosures.

25 **II. DISCOVERY REMAINING**

- 26 • GVCL is in the process of responding to GoPetFriendly’s first set of requests for
27 production of documents. The parties have agreed that GVCL will provide its
28 responses by no later than May 7, 2018;
- Additional requests for production of documents may be issued depending upon
GVCL’s responses;
- Additional third party subpoenas may be issued;
- Party and third party depositions may be taken; and

- Any other discovery the parties deem necessary to the claims and defenses in this case.

III. REASONS WHY DEADLINE TO AMEND PLEADINGS OR ADD PARTIES WAS NOT COMPLETED

On March 9, GVCL's and Neziol's then counsel, Mr. Harold Gewerter, moved to withdraw as counsel of record, which was granted on March 28, 2018. ECF Nos. 64-65. Prior to that timeframe, GVCL and Neziol had not made their initial disclosures, despite GoPetFriendly's diligent efforts to meet and confer with them to require them to do so. As the motion to withdraw was pending, GVCL's response to GoPetFriendly's requests for production of documents became due. Despite GoPetFriendly's counsel diligent efforts to obtain those responses before Mr. Gewerter withdrew, GVCL did not provide responses to the document requests.

After Mr. Gewerter withdrew, GVCL's and Neziol's current counsel, Mr. Perez appeared and requested an extension on the production requests, due to family circumstances and his recent retention and appearance in the case, which GoPetFriendly agreed to. Shortly after that, Mr. Perez was out of the office for a couple of weeks due to those family circumstances, so he and GoPetFriendly's counsel were unable, until just recently, to solidify the definitive extensions of the extended discovery and case scheduling deadlines as set forth herein.

In accommodating GVCL's and Neziol's switching of counsel and Mr. Perez's family circumstances and recent retention, GoPetFriendly has requested, and GVCL and Neziol have agreed to, to extend the discovery and case scheduling deadlines, to allow GoPetFriendly sufficient time to review and evaluate the documents, and conduct any necessary follow up discovery, to determine whether it needs to amend the pleadings or add new parties. GVCL's and Neziol's very recent initial disclosures also contributed to the need for the extension. Thus, good cause and excusable neglect exists to extend the deadline by which to amend the pleadings or add new parties, and to correspondingly extend the other discovery and case scheduling deadlines.

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IV. THE PROPOSED SCHEDULE FOR COMPLETING ALL REMAINING DISCOVERY

The parties propose the following schedule for completing all remaining discovery and case scheduling deadlines:

- The new deadline to amend pleadings or add parties shall be June 18, 2018;
- The new deadline for initial expert disclosures shall be July 16, 2018;
- The new deadline for rebuttal expert disclosures shall be August 13, 2018;
- The new deadline for the close of discovery shall be September 10, 2018;
- The new deadline for dispositive motions shall be October 9, 2018;
- The new deadline for the joint pretrial order shall be November 6, 2018, unless dispositive motions have been filed, in which case it shall be suspended until 30 days after decision on the dispositive motions or further court order.

IT IS SO STIPULATED.

Dated this 2nd day of May, 2018

Dated this 2nd day of May, 2018.

MARQUIS AURBACH COFFING

LAW OFFICE OF SHAWN PEREZ

/s/ Chad F. Clement

/s/ Shawn Perez

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and Gerald Neziol*

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

DATED this 4th day of May, 2018.