

LAGOMARSINO LAW

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11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 STEVEN TRANG, an individual,

14 Plaintiff,

15 vs.

16 BANK OF GEORGE, a Domestic
17 Corporation; and T. RYAN SULLIVAN in
18 his individual and professional capacity,

19 Defendants.

Case No.: 2:17-cv-00162-APG-EJY

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22 **STIPULATION AND ~~PROPOSED~~**
23 **ORDER TO EXTEND DEADLINE FOR**
24 **COUNTERDEFENDANT TO FILE A REPLY**
25 **BRIEF TO COUNTERCLAIMANT'S**
26 **OPPOSITION TO COUNTERDEFENDANT'S**
27 **SPECIAL MOTION TO DISMISS**

28 **(First Request)**

29 Pursuant to LR IA 6-1, 6-2, Plaintiff/Counterdefendant STEVEN TRANG, by and through his
30 attorney of record, Andre Lagomarsino, Esq. of Lagomarsino Law and Defendants/Counterclaimants
31 BANK OF GEORGE and T. RYAN SULLIVAN by and through their attorney of record, Richard I.
32 Dreitzer, Esq. of the law firm of Fennemore Craig, P.C. hereby stipulate to extend the deadline for
33 Counterdefendant to file a Reply to Counterclaimant's Opposition to Counterdefendant's Special
34 Motion to Dismiss (ECF No. 61). Counterdefendant filed his Special Motion to Dismiss

1 Counterclaimant’s Counterclaim (ECF No. 55) on April 19, 2021. Pursuant to stipulation,
2 Counterclaimant filed its Opposition to Counterdefendant’s Special Motion to Dismiss on May 31,
3 2021. (ECF No. 61). **The Reply brief is currently due June 8, 2021.**

4 This is the first request for an extension to file a Reply brief.

5 The reason for the extension is that Counterdefendant’s counsel has only one (1) attorney
6 currently on the case and that attorney was briefing three (3) other voluminous briefs in two (2)
7 different cases during the time that was allotted to file a Reply brief in this case. The undersigned
8 counsel (the aforementioned attorney) worked all three (3) days of the Memorial Day weekend and
9 all of the following week in an effort to get caught up to the Reply brief but was unsuccessful.

10 The following week, the Counterdefendant’s counsel and the other attorney in his firm will be
11 in depositions and preparing for depositions in other important and large damage matters and will be
12 precluded from devoting adequate time to the Reply brief. While the undersigned has enlisted a law
13 clerk to assist, counsel will still need time to review, research, edit and finalize the Reply brief so that
14 it is of the quality that is expected in United States District Court.
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The parties agree, subject to the Court’s approval, that the new deadline to file a Reply brief will be June 22, 2021. The requested extension is sought in good faith and not for purposes of undue delay.

IT IS SO STIPULATED.

DATED: this 4th day of June, 2021.

FENNEMORE CRAIG, P.C.

By: /s/ Richard I. Dreitzer
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Attorneys for Defendants/Counterclaimants BANK OF GEORGE and SULLIVAN

Dated this 4th day of June, 2021.

LAGOMARSINO LAW FIRM

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Attorneys for Plaintiff/Counterdefendant TRANG

IT IS SO ORDERED.

By: 
UNITED STATES MAGISTRATE JUDGE

Dated: June 7, 2021