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 and *Douglas Birrell*

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 CHOCOLATE MAGIC LAS VEGAS LLC, a
 Delaware limited liability company,

12 Plaintiff,

13 vs.

14 BLAIR ELLIOT FORD, JR., an individual;
 15 CINDY WIX-INGLING, an individual;
 NORMAN VIDA, an individual; and ALICE
 16 KELLEY, an individual, inclusive,

17 Defendants.

18 CINDY WIX-INGLING

19 Counter-Claimant,

20 vs.

21 CHOCOLATE MAGIC LAS VEGAS LLC,
 a Delaware Limited Liability Company;
 22 DINO DICIENZO, an individual;
 DOUGLAS BIRRELL, an individual;
 23 inclusive,

24 Counter-Defendants.

CASE NO.: 2:17-CV-00690-GMN-NJK

**STIPULATION AND [PROPOSED]
 ORDER TO EXTEND BRIEFING
 DEADLINE RELATED TO
 PLAINTIFF'S RESPONSE TO
 DEFENDANT'S MOTION TO DISMISS
 COMPLAINT [ECF NO. 21]**

(SECOND REQUEST)

25 Pursuant to LR6-1, the parties hereby stipulate and agree to extend the deadline for
 26 Plaintiff Chocolate Magic Las Vegas, LLC to file its response to Defendant Blair Ford's Motion to
 27 Dismiss Complaint (ECF No. 21), which has a current due date of May 15, 2017. This Court
 28 previously granted the parties' first request, extending the deadline through May 15, 2017. (ECF

1 No. 24.) However, since the first extension was requested, counsel for the non-movant has
2 learned that the client contact with whom he must work to prepare the evidence required by the
3 response is traveling internationally and will be unavailable in the immediate future. To allow for
4 this, the parties stipulate to an extension of time for Plaintiff Chocolate Magic Las Vegas, LLC to
5 file its response through and including May 23, 2017.

6 The foregoing request to extend a deadline is made in good faith, and is not made for the
7 purpose of delay.

8 IT IS SO STIPULATED:

9 Dated this 4th day of May, 2017.

Dated this 4th day of May, 2017

10 LEWIS ROCA ROTHGERBER CHRISTIE LLP

GABROY LAW OFFICES

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13 By: /s/ John E. Bragonje

By: /s/ Christian Gabroy

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Attorneys Defendant Blair Elliot Ford

20
21 **ORDER**

22 IT IS SO ORDERED:

23
24 
25 _____
26 UNITED STATES DISTRICT JUDGE

27 DATED: May 5, 2017