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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

11 BOARD OF TRUSTEES OF THE
 12 PLUMBERS AND PIPEFITTERS UNION
 LOCAL 525 PENSION PLAN,

13 Plaintiff,

14 v.

15 TAMARA L. BLEVINS, as an individual;
 16 TAMARA L. BLEVINS, as the Court-
 Appointed Personal Representative of the
 17 Estate of Lawrence R. Brosi; ZENITH
 AMERICAN SOLUTIONS, INC., a Maryland
 18 corporation; THE PEOPLES STATE BANK,
 an Indiana corporation,

19 Defendants.

CASE NO.: 2:17-CV-01223-RFB-NJK

**STIPULATION AND ORDER TO
EXTEND RESPONSE DEADLINES**

[FIRST REQUEST]

20 Plaintiff, the Board of Trustees of the Plumbers and Pipefitters Union Local 525 Pension
 21 Plan (the “Trust”) and Defendant The Peoples State Bank (“PSB”) by and through their
 22 undersigned counsel of record, stipulate and request an order extending the Trust’s response
 23 deadline to PSB’s Motion to Dismiss [ECF No. 38, filed November 1, 2017] by 14 (fourteen)
 24 days from November 15, 2017, to November 29, 2017. The parties also stipulate and request that
 25 PSB’s reply in support of its Motion to Dismiss be due on December 6, 2017.

26 The parties also stipulate and request an order extending the Trust’s response deadline to
 27 PSB’s Motion to Quash Summons [ECF No. 35, filed October 30, 2017] by sixteen (16) days
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1 from November 13, 2017, to November 29, 2017. The parties also stipulate and request that
2 PSB's reply in support of its Motion to Quash Summons be due on December 6, 2017.

3 The motions filed on October 30, 2017 [ECF 35] and November 1, 2017 [ECF 38] are
4 identical. Based on the Court's Notice of Non Compliance with LR IC 2-2 and FRCP 7 [ECF
5 No. 37], the Trust's counsel was under the impression that both the Motion to Quash Summons
6 and Motion to Dismiss were considered filed on November 1, 2017, and calculated that
7 responsive pleading to both the Motion to Quash and the Motion to Dismiss as being due on
8 November 15, 2017. It has now come to the Trust counsel's attention that the Motion to Quash
9 Summons may have been considered filed on October 30, 2017, and that a responsive pleading
10 would have been due on November 13, 2017. Because both the Motion to Quash Summons and
11 the Motion to Dismiss request substantially the same relief, an extension to respond to the Motion
12 to Quash Summons will not cause undue delay or inefficiency.

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1 The pending extension request will have no prejudice on the pending discovery cutoff
2 deadlines and is not sought for an improper purpose or delay.
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11 Attorneys for Plaintiff

Attorneys for Defendant, The Peoples State
Bank

12 Dated: November 15, 2017

Dated: November 15, 2017

15 **ORDER**

16 **IT IS SO ORDERED** that the Trust's responses to the PBS's Motion to Dismiss and
17 Motion to Quash Summons are due November 29, 2017, and PBS's replies in support to the
18 Motions are due December 6, 2017.

19 
20 RICHARD F. BOULWARE, II
21 United States District Judge

22 **CASE NO: 2:17-CV-01223-RFB-NJK**

23 **DATED:** November 16, 2017.
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