

1 **CHRISTENSEN JAMES & MARTIN**
 2 KEVIN B. CHRISTENSEN, ESQ. (175)
 3 WESLEY J. SMITH, ESQ. (11871)
 4 7440 W. Sahara Avenue
 5 Las Vegas, Nevada 89117
 6 Telephone: (702) 255-1718
 7 Facsimile: (702) 255-0871
 8 kbc@cjmlv.com, wes@cjmlv.com
 9 *Attorneys for Plaintiff Board of Trustees*
 10 *of the Southern Nevada Glaziers and*
 11 *Fabricators Pension Trust Fund*

7 **UNITED STATES DISTRICT COURT**
 8 **DISTRICT OF NEVADA**

9 * * * * *

10 BOARD OF TRUSTEES OF THE
 11 SOUTHERN NEVADA GLAZIERS
 12 AND FABRICATOR PENSION TRUST
 13 FUND,

CASE NO.: 2:17-cv-01330-JAD-GWF

STIPULATION TO EXTEND TIME
TO FILE RESPONSIVE PLEADING

13 Plaintiff,

14 vs.

[First Request]

15 HEINAMAN CONTRACT GLAZING,
 16 INC., a California corporation; JOHN L.
 17 HEINAMAN, an individual; TOM T.
 18 HOWHANNESIAN, an individual; RICK
 19 K. DONATH, an individual; VERONICA
 20 BOWEN, an individual; ISABELLE
 21 LOHRKE, an individual; JOHN DOES I-
 22 XX, inclusive; and ROE ENTITIES I-XX,
 23 inclusive,

Date: N/A
 Time: N/A

20 Defendants.

22 The Plaintiff, BOARD OF TRUSTEES OF THE SOUTHERN NEVADA
 23 GLAZIERS AND FABRICATORS PENSION TRUST FUND (“Plaintiff”), and
 24 Defendants HEINAMAN CONTRACT GLAZING, INC., JOHN L. HEINAMAN, TOM
 25 T. HOWHANNESIAN, RICK K. DONATH, and VERONICA BOWEN
 26 (“Defendants”), each acting by and through their undersigned counsel, hereby stipulate
 27 and agree as follows:

- 28 1. Defendants Heinaman Contract Glazing, Inc., John L. Heinaman, and Tom

CHRISTENSEN JAMES & MARTIN
 7440 WEST SAHARA AVE., LAS VEGAS, NEVADA 89117
 PH: (702) 255-1718 § FAX: (702) 255-0871

CHRISTENSEN JAMES & MARTIN
7440 WEST SAHARA AVE., LAS VEGAS, NEVADA 89117
PH: (702) 255-1718 § FAX: (702) 255-0871

1 T. Howhannesian have received a copy of the Summons and Complaint and agree to save
2 the expense of formal service. Heinaman Contract Glazing, Inc., John L. Heinaman, and
3 Tom T. Howhannesian understand that they retain all defenses to the lawsuit, the Court's
4 jurisdiction, and the venue of the action, but that they waive any objections to service.
5

6 2. Defendants Heinaman Contract Glazing, Inc., John L. Heinaman, Tom T.
7 Howhannesian, Rick K. Donath, and Veronica Bowen shall have thirty (30) days from
8 the date of filing this Stipulation to file an answer or responsive pleading.

9 3. This is the first request to extend time to file an answer or responsive
10 pleading for these Defendants. The reason for the extension requested is to allow the
11 parties time to informally exchange documents and discuss resolution of this matter.
12

13 DATED this 9th day of August, 2017.

14 CHRISTENSEN JAMES & MARTIN
15 By: /s/ Wesley J. Smith
16 Wesley J. Smith, Esq.
17 *Attorneys for Plaintiff Board of Trustees*
of the Southern Nevada Glaziers and
Fabricators Pension Trust Fund

SHULMAN HODGES & BASTIAN, LLP
By: /s/ James C. Bastian
James C. Bastian, Esq.
Attorneys for Defendants Heinaman
Contract Glazing, Inc., John L.
Heinaman, Tom T. Howhannesian, Rick
K. Donath, and Veronica Bowen

19
20 IT IS SO ORDERED:

21 George Foley Jr.
22 UNITED STATES MAGISTRATE JUDGE

23 DATED: 8/10/2017
24
25
26
27
28