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9 *Attorneys for Plaintiff Board of Trustees
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10
11 **UNITED STATES DISTRICT COURT**
12
13 **DISTRICT OF NEVADA**

14 * * * * *

15 BOARD OF TRUSTEES OF THE
16 SOUTHERN NEVADA GLAZIERS
17 AND FABRICATOR PENSION TRUST
18 FUND,

19 Plaintiff,

20 vs.

21 HEINAMAN CONTRACT GLAZING,
22 INC., a California corporation; JOHN L.
23 HEINAMAN, an individual; TOM T.
24 HOWHANNESIAN, an individual; RICK
25 K. DONATH, an individual; VERONICA
26 BOWEN, an individual; ISABELLE
27 LOHRKE, an individual; JOHN DOES I-
XX, inclusive; and ROE ENTITIES I-XX,
inclusive,

28 Defendants.

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

**STIPULATION TO EXTEND TIME
TO FILE RESPONSIVE PLEADING**

[First Request]

Date: N/A

Time: N/A

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

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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

18 By: /s/ James C. Bastian
19 James C. Bastian, Esq.
20 *Attorneys for Defendants Heinaman
Contract Glazing, Inc., John L.
Heinaman, Tom T. Howhannesian, Rick
K. Donath, and Veronica Bowen*

21 IT IS SO ORDERED:
22

23 
24 UNITED STATES MAGISTRATE JUDGE
25

26 DATED: 8/10/2017
27
28