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 9 *Attorneys for Plaintiff Board of Trustees of the*  
 10 *Painters & Floorcoverers Joint Committee*

7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 \* \* \* \* \*

10 BOARD OF TRUSTEES OF PAINTERS  
 11 & FLOORCOVERERS JOINT  
 12 COMMITTEE,

13 Plaintiff,

14 vs.

15 CHRISTOPHER B. ARNOLD, an  
 16 individual; CBA INVESTMENTS, LLC,  
 17 a Nevada limited liability company; HI-  
 18 CON, INC., a California corporation; RM  
 19 GENERAL CONTRACTING, INC., a  
 20 Nevada corporation; DOES I-X, inclusive;  
 21 ROE ENTITIES I-X, inclusive,

22 Defendants.

CASE NO.: 2:17-cv-01366-MMD-GWF

23 **STIPULATION AND JOINT**  
 24 **MOTION TO EXTEND DISCOVERY**  
 25 **CUT-OFF DATE**  
 26 **[Second Request]**

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27 The Plaintiff, BOARD OF TRUSTEES OF PAINTERS & FLOORCOVERERS  
 28 JOINT COMMITTEE (“Plaintiff” or “PFJC”), by and through its attorneys, Christensen  
 James & Martin, Chtd., and Defendant, HI-CON, INC. (“Hi-Con”), by and through its  
 attorneys, Dickinson Wright PLLC, pursuant to LR 26-4 and LR IA 6-1, hereby stipulate  
 and jointly move for an extension of the discovery cut-off date, as follows:

1. On January 17, 2018, the Plaintiff filed a Motion to Extend Discovery  
 Cut-Off Date [First Request] [ECF No. 24].

1           2.       On January 19, 2018, the Court entered an Order [ECF No. 25] denying  
2 the Motion without prejudice for failure “to provide adequate certification regarding the  
3 parties’ meet and confer efforts.”

4           3.       The Parties have met and conferred and agree that extension of the  
5 discovery cut-off date is appropriate for the reasons set forth in the Motion.

6           4.       The Parties will use the extra time to complete remaining discovery and  
7 work toward completing a settlement.

8           5.       The Parties request that the Discovery Cut-Off Date of January 31, 2018  
9 be extended 45 days to Monday, March 19, 2018.

10          6.       Following denial of the first request without prejudice, this is the parties’  
11 second request for extension of the discovery cut-off date.

12           **CHRISTENSEN JAMES & MARTIN**

13           **DICKINSON WRIGHT PLLC**

14           By: /s/ Wesley J. Smith  
15           Wesley J. Smith, Esq.  
16           Nevada Bar No. 11871  
17           Attorneys for Plaintiff Board of Trustees  
18           of the Painters & Floorcoverers Joint  
19           Committee

20           By: /s/ Eric D. Hone  
21           Eric D. Hone, Esq.  
22           Nevada Bar No. 8499  
23           Attorneys for Defendant Hi-Con, Inc.

24           Date: 1/24/2018

25           Date: 1/24/2018

26           IT IS SO ORDERED.

27           George Foley Jr.  
28           United States Magistrate Judge

            Date: 01/25/2018