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9 *Attorneys for Defendant*
Mania Media LLC

11 **UNITED STATES DISTRICT COURT**
 12 **DISTRICT OF NEVADA**

14 BEAR OMNIMEDIA LLC,
 15 Plaintiff,
 16 v.
 17 MANIA MEDIA LLC dba "BEAR FILMS"
 18 and BEARFILMS.COM, et. al.
 19 Defendants.

Case No.: 2:17-cv-1478-MMD-CWH
STIPULATION AND (PROPOSED)
ORDER TO EXTEND TIME TO
RESPOND TO THIRD AMENDED
COMPLAINT
(Second Request)

1 Plaintiff Bear Omnimedia LLC (“Omnimedia”) and Defendant Mania Media LLC dba
2 “Bear Films” and BearFilms.com (“Mania Media”), by and through their respective counsel, do
3 hereby stipulate and agree as follows:

4 1. On December 14, 2017, this Court entered an Order granting Mania Media’s
5 motion to set aside clerk’s entry of default (ECF No. 79), in which Mania Media requested 20
6 days from the date of entry of the order to respond to Omnimedia’s Third Amended Complaint
7 (the “TAC”).

8 2. On January 3, 2018, Mania Media moved for an extension of time of seven days
9 to respond to Omnimedia’s TAC (ECF No. 83), which the Court granted on January 4, 2018 (ECF
10 No. 84).

11 3. Mania Media’s current deadline to respond to the TAC is January 10, 2018.

12 4. Last weekend, counsel for Mania Media Chad Anderson was injured in an
13 automobile accident, which has affected his ability to draft a response to the TAC.

14 5. Mania Media has recently retained new counsel, Randazza Legal Group, PLLC,
15 (“RLG”) on a limited basis relevant to responding to the TAC. RLG requires additional time to
16 become familiar with the case so that it can carry out the purpose of its limited engagement with
17 Mania Media.

18 6. Therefore, the parties agree that the Court may enter the following Order and
19 request that the Court do so accordingly:

20 a. Defendant Mania Media LLC shall have until January 17, 2018 to file a response
21 to Plaintiff’s Third Amended Complaint.

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1 **SO STIPULATED AND AGREED** on this 10th day of January, 2018.

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3 RANDAZZA LEGAL GROUP, PLLC

4 /s/ Marc J. Randazza

5 Marc J. Randazza (NV Bar No. 12265)

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11
12 WOLFE THOMPSON PS

13 /s/ Wolfe Thompson

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17 *Attorney for Plaintiff,*

18 *Bear Omnimedia LLC*

19 **IT IS SO ORDERED.**

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UNITED STATES MAGISTRATE JUDGE

Dated: January 11, 2018