

BROWNSTEIN HYATT FARBER SCHRECK, LLP
5371 Kietzke Lane
Reno, Nevada 89511
Tel. 775-324-4100
Fax. 775-333-8171

1 Michael D. Rounds (NV Bar No. 4734)
2 Arthur A. Zorio (NV Bar No. 6547)
3 **BROWNSTEIN HYATT FARBER SCHRECK, LLP**
4 5371 Kietzke Lane
5 Reno, NV 89511
6 Telephone: (775) 324-4100
7 Facsimile: (775) 333-8171
8 Email: mrounds@bhfs.com
9 azorio@bhfs.com

10 [additional counsel on signature page]

11 Counsel for Defendants SIMILASAN CORPORATION
12 and SIMILASAN AG

13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 T.R.P. COMPANY, INC.,
16 Plaintiff,
17 v.
18 SIMILASAN AG AND SIMILASAN
19 CORPORATION,
20 Defendants.

Case No.: 2:17-cv-02197-JCM-DJA

JOINT STIPULATION AND
~~PROPOSED~~ ORDER TO EXTEND
PRE-TRIAL ORDER DEADLINE
(THIRD REQUEST)

21 Plaintiff T.R.P. Company, Inc. (“TRP”) and Defendants Similasan AG and Similasan
22 Corporation (collectively, “Similasan”), by and through their counsel of record, hereby stipulate
23 and agree to extend the Pre-Trial Order deadline of the Joint Discovery Plan for 4 weeks. The
24 parties have engaged in substantial settlement negotiations, have reached a non-binding
25 settlement in principle on most of the terms, counsel for TRP has prepared a settlement agreement
26 that is under review by counsel for Similasan, and the parties anticipate finalizing and executing
27 the formal, binding settlement agreement in the next couple of weeks. Although the request is
28 being made fewer than 21 days from the pending deadline, the parties believe that an extension
would be in the interests of judicial economy and efficiency. The proposed deadline to be

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

extended is:

1. Pre-Trial Order: September 22, 2020 to October 22, 2020.

Discovery is completed and there are no pending motions.

The Parties represent that this Stipulation is sought in good faith and for good cause. The Parties are actively involved in settlement discussions that will fully resolve the matter and a written settlement agreement has been prepared and is under review. The Parties hereby jointly respectfully request that the aforementioned Pre-Trial Order deadline be extended accordingly.

Dated: September 17, 2020 Respectfully submitted,

DICKINSON WRIGHT PLLC

By: /s/ Meaghan H. Kent
MICHAEL N. FEDER
(NV Bar No. 7332)
8363 West Sunset Road, Suite 200
Las Vegas, Nevada 89113-2210
Email: mfeder@dickinson-wright.com

BROWNSTEIN HYATT FARBER SCHRECK, LLP

By: /s/ Arthur A. Zorio
Michael D. Rounds (NV Bar No. 4734)
Arthur A. Zorio (NV Bar No. 6547)
5371 Kietzke Lane
Reno, NV 89511
Telephone: (775) 324-4100
Facsimile: (775) 333-8171
Email: mrounds@bhfs.com
azorio@bhfs.com

VENABLE LLP

Daniel S. Silverman (Pro Hac Vice)
2049 Century Park East, Suite 2300
Los Angeles, California 90067
Tel: (310) 229-0373
Fax: (310) 229-9901
Email: dssilverman@venable.com

CROWELL & MORING LLP

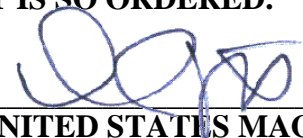
Valerie Goo (pro hac vice)
Raija J. Horstman (pro hac vice)
515 S. Flower Street, 40th Floor
Los Angeles, CA 90071
Telephone: (213) 622-4750
Facsimile: (213) 622-2690
Email: vgoo@crowell.com
rhorstman@crowell.com

Meaghan H. Kent (Pro Hac Vice)
600 Massachusetts Avenue., NW
Washington, D.C. 20001
Tel: (202) 344-4000
Fax: (202) 344-8300
Email: mhkent@venable.com

Counsel for Defendants
SIMILASAN CORPORATION and
SIMILASAN AG

Attorneys for Plaintiff T.R.P. Company,
Inc.

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

Dated: September 18, 2020

