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 6 *Harbor Freight Tools USA, Inc.*

7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 DAN GOULD, an individual, and AUDREE  
 GOULD, an individual,

10 Plaintiffs,

11 vs.

12 WILLIAM ROGERS, an individual,  
 13 HARBOR FREIGHT TOOLS USA, INC.,  
 a California Corporation, DOES I through  
 14 X, inclusive, and ROE CORPORATIONS I  
 through X, inclusive,

15 Defendants.

Case No. 2:17-cv-02435-APG-NJK

**STIPULATION AND ORDER TO  
 CONTINUE RESPONSE TO  
 PLAINTIFFS' COMPLAINT AND  
 MOTION FOR REMAND**

**[FIRST REQUEST]**

17 Plaintiffs Dan and Audree Gould, and Defendants William Rogers ("Rogers") and Harbor  
 18 Freight Tools USA, Inc. ("Harbor Freight," together with Rogers, "Defendants"), through their  
 19 respective counsel, stipulate for the first time to continue Defendant Rogers' response to  
 20 Plaintiffs' Complaint and Defendants' response to Plaintiffs' Motion for Remand, ECF No. 10, as  
 21 follows:

22 WHEREAS, Plaintiffs served Defendant Rogers with the Summons and Complaint on  
 23 October 6, 2017;

24 WHEREAS, Defendant Rogers' response to Plaintiffs' Complaint is due October 27,  
 25 2017;

26 WHEREAS, Defendants' response to Plaintiffs' Motion for Remand is due October 30,  
 27 2017;

28 WHEREAS, this request is timely;

1 WHEREAS, the Parties agreed to provide Defendants’ additional time to respond to  
2 Plaintiffs’ Complaint and Motion for Remand;

3 WHEREAS, this request is not made for purposes of delay and is supported by good  
4 cause;

5 NOW, THEREFORE, in consideration of the foregoing, and for good cause, IT IS  
6 HEREBY STIPULATED AND AGREED, by and between the Parties as follows:

7 1. Defendant Rogers will respond to Plaintiffs’ Complaint on or before November  
8 10, 2017.

9 2. Defendants will respond to Plaintiffs’ Motion for Remand on or before November  
10 13, 2017.

11 **IT IS SO STIPULATED.**

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| <p>DATED: October 25, 2017.</p> <p>JENNINGS &amp; FULTON, LTD.</p> <p>By: /s/ Adam R. Fulton _____<br/> JARED B. JENNINGS, ESQ.<br/> ADAM R. FULTON, ESQ.<br/> TOD R. DUBOW, ESQ.<br/> 2580 Sorrel Street<br/> Las Vegas, NV 89146<br/> Telephone: (702) 979-3565<br/> Facsimile: (702) 362-2060</p> <p><i>Attorneys for Plaintiffs</i></p> | <p>DATED: October 25, 2017.</p> <p>SNELL &amp; WILMER L.L.P.</p> <p>By: /s/ Karl O. Riley _____<br/> Karl O. Riley, Esq.<br/> Nevada Bar No. 12077<br/> 3883 Howard Hughes Parkway, Suite 1100<br/> Las Vegas, NV 89169</p> <p><i>Attorney for Defendants William Rogers<br/> and Harbor Freight Tools USA, Inc.</i></p> |
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**ORDER**

IT IS ORDERED THAT Defendant Rogers shall respond to Plaintiffs’ Complaint on or  
before November 10, 2017.

IT IS FURTHER ORDERED THAT Defendants shall respond to Plaintiffs’ Motion for  
Remand on or before November 13, 2017.

**IT IS SO ORDERED.**

  
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UNITED STATES DISTRICT JUDGE  
Dated: October 25, 2017.