

Snell & Wilmer
LLP
LAW OFFICES
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, Nevada 89169
702.784.5200

1 Karl O. Riley, Esq.
Nevada Bar No. 12077
2 SNELL & WILMER L.L.P.
3883 Howard Hughes Parkway, Suite 1100
3 Las Vegas, NV 89169
Telephone: (702) 784-5200
4 Facsimile: (702) 784-5252
Email: kriley@swlaw.com

5 *Attorney for Defendant*
6 *Harbor Freight Tools USA, Inc.*
7 *and William Rogers*

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 DAN GOULD, an individual, and AUDREE
GOULD, an individual,

11 Plaintiffs,

12 vs.

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

16 Defendants.

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

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

[SECOND REQUEST]

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

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

25 WHEREAS, Defendant Rogers’ response to Plaintiffs’ Complaint is due November 10,
26 2017;

27 WHEREAS, Defendants’ response to Plaintiffs’ Motion for Remand is due November 13,
28 2017;

1 WHEREAS, this request is timely;

2 WHEREAS, the Parties agreed to provide Defendants' additional time to respond to
3 Plaintiffs' Complaint and Motion for Remand to permit Defendants to file a stipulation to
4 substitute Clyde & Co US LLP as counsel of record and to provide the Court sufficient time to
5 issue an order on the same;

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

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

10 1. Defendant Rogers will respond to Plaintiffs' Complaint on or before
11 November 16, 2017.

12 2. Defendants will respond to Plaintiffs' Motion for Remand on or before
13 November 16, 2017.

14 **IT IS SO STIPULATED.**

<p>15 DATED: November 6, 2017. 16 JENNINGS & FULTON, LTD.</p> <p>17 By: <u>/s/ Adam R. Fulton</u> 18 JARED B. JENNINGS, ESQ. 19 ADAM R. FULTON, ESQ. 20 TOD R. DUBOW, ESQ. 21 2580 Sorrel Street 22 Las Vegas, NV 89146 Telephone: (702) 979-3565 Facsimile: (702) 362-2060</p> <p><i>Attorneys for Plaintiffs</i></p>	<p>DATED: November 6, 2017. SNELL & WILMER L.L.P.</p> <p>By: <u>/s/ Karl O. Riley</u> Karl O. Riley, Esq. Nevada Bar No. 12077 3883 Howard Hughes Parkway, Suite 1100 Las Vegas, NV 89169</p> <p><i>Attorney for Defendants William Rogers and Harbor Freight Tools USA, Inc.</i></p>
--	---

23 **ORDER**

24 IT IS ORDERED that Defendant Rogers shall respond to Plaintiffs' Complaint on or before
25 November 16, 2017.

26 IT IS ORDERED that Defendants shall respond to Plaintiffs' Motion for Remand on or
27 before November 16, 2017.

28 Dated: November 8, 2017.


UNITED STATES DISTRICT JUDGE