

1 Craig A. Newby (Nevada Bar No. 8591)  
**McDONALD CARANO, LLP**  
 2 2300 W. Sahara Ave., Ste. 1200  
 Las Vegas, NV 89102  
 3 Tel. (702) 873-4100  
 Fax (702) 873-9966  
 4 Email: cnewby@mcdonaldcarano.com

5 John B. Sganga, Jr. (Admitted *Pro Hac Vice*)  
 Sean M. Murray (Admitted *Pro Hac Vice*)  
 6 Joshua Stowell (Admitted *Pro Hac Vice*)  
 Justin J. Gillett (Admitted *Pro Hac Vice*)  
 7 **KNOBBE, MARTENS, OLSON & BEAR, LLP**  
 2040 Main Street, Fourteenth Floor  
 8 Irvine, CA 92614  
 Phone: (949) 760-0404  
 9 Facsimile: (949) 760-9502  
 Email: john.sganga@knobbe.com  
 10 Email: sean.murray@knobbe.com  
 Email: joshua.stowell@knobbe.com  
 11 Email: justin.gillett@knobbe.com

12 *Attorneys for Plaintiff,*  
 13 *JS Products, Inc.*

**FOLEY & OAKES, PC**  
 Daniel T. Foley (Nevada State Bar No.  
 1079)  
 626 So. 8th Street  
 Las Vegas, NV 89101  
 Telephone: (702) 384-2070  
 Facsimile: (702) 384-2128  
 Email: Dan@foleyoakes.com

**BUETHER JOE & CARPENTER, LLC**  
 ERIC W. BUETHER (*to be Admitted Pro*  
*Hac Vice*)  
 Email: Eric.Buether@BJCIPLaw.com  
 CHRISTOPHER M. JOE (*to be Admitted*  
*Pro Hac Vice*)  
 Email: Chris.Joe@BJCIPLaw.com  
 MICHAEL D. RICKETTS (*to be Admitted*  
*Pro Hac Vice*)  
 Email: Mickey.Ricketts@BJCIPLaw.com  
 1700 Pacific Avenue, Suite 4750  
 Dallas, Texas 75201  
 Telephone: (214) 466-1270  
 Facsimile: (214) 635-1842

*Attorneys for Defendant,*  
**ROLLER CLUTCH TOOLS, LLC**

16 **IN THE UNITED STATES DISTRICT COURT**  
 17 **FOR THE DISTRICT OF NEVADA**

18 JS PRODUCTS, INC., a Nevada corporation,  
 19  
 Plaintiffs,  
 20  
 v.  
 21 ROLLER CLUTCH TOOLS, LLC,  
 22 a California limited liability company,  
 23 Defendant.

Case No. 2:17-cv-02615-GMN-GWF

**STIPULATION REGARDING  
 EXTENSION OF TIME FOR PLAINTIFF  
 TO RESPOND TO DEFENDANT'S  
 MOTION TO DISMISS; AND TO REPLY  
 TO ITS MOTION TO ENJOIN ROLLER  
 CLUTCH FROM PROSECUTING CASE  
 AGAINST DEFENDANT BEFORE THE  
 EASTERN DISTRICT TO TEXAS**

**(Third Request for Extension to Respond to  
 Motion to Dismiss)**

**(Fourth Request for Extension to Reply to  
 Its Motion to Enjoin Roller Clutch)**

1 Pursuant to Fed. R. Civ. P. 6(b)(1)(A), Local Rules 6-1 and 6-2, Plaintiff JS Products,  
2 Inc. (“JS Products” or “Plaintiff”) has requested, and Defendant Roller Clutch Tools, LLC  
3 (“Roller Clutch” or “Defendant”) has agreed to, a two week extension of time, until **February**  
4 **2, 2018**, for Plaintiff to file its Response to Defendant’s Motion to Dismiss for Lack of Personal  
5 Jurisdiction Under Fed. R. Civ. P. 12(b)(2) and Improper Venue Under Fed. R. Civ. P. 12(b)(3).  
6 (ECF No. 30, “Motion”). This is the Parties’ third request for an extension of the deadline to  
7 oppose the Motion. The Motion was originally filed on December 15, 2017 and the opposition  
8 is currently scheduled to be due on or before January 19, 2018.

9 Further, Defendant has also agreed to, a two week extension of time, until **February 2,**  
10 **2018**, for Plaintiff to file its Reply to Its Motion to Enjoin Roller Clutch Tools, LLC from  
11 Prosecuting its Case Against Defendant before the United States District Court for the Eastern  
12 District of Texas. (ECF No. 07, “Motion”). This is the Parties’ fourth request for an extension  
13 of the deadline to oppose the Motion. The Motion was originally filed on October 20, 2017, the  
14 Opposition (ECF No. 29, “Opposition”) was filed December 15, 2017 and the Reply is  
15 currently scheduled to be due on or before January 19, 2018.

16 **Good cause exists for this Court to grant this final extension because the Parties**  
17 **have reached an agreement in principle that settles all matters in controversy between**  
18 **them.** Since submitting the last request for a time extension, the parties have exchanged  
19 several drafts of a comprehensive settlement agreement and are making progress toward  
20 reaching mutually agreeable language for several provisions in the agreement. The Parties  
21 respectfully and jointly request that this Court grant the requested extension to allow the parties  
22 to devote their full attention to finalizing the agreement, which will result in a dismissal  
23 stipulation being filed with the Court, and will moot the pending motions. **The parties are**  
24 **amenable to a status conference before the Court, should it desire a further update on the**  
25 **status of drafting a final, comprehensive settlement agreement.**

26 Accordingly, the Parties hereby stipulate that Plaintiff has until **February 2, 2018** to  
27 file its Opposition to Defendant Roller Clutch’s Motion to Dismiss for Lack of Personal  
28 Jurisdiction Under Fed. R. Civ. P. 12(b)(2) and Improper Venue Under Fed. R. Civ. P.

1 12(b)(3); and to Reply to Its Motion to Enjoin Roller Clutch Tools, LLC from Prosecuting its  
2 Case Against the Defendant in the matter before the United States District Court for the  
3 Eastern District of Texas.

4 Dated: January 17, 2018

**MCDONALD CARANO LLP**

5  
6 /s/ Craig A. Newby

Craig A. Newby (Nevada Bar No. 8591)  
Amanda M. Perach (Nevada Bar No. 12399)  
2300 W. Sahara Ave., Suite 1200  
Las Vegas, NV 89102  
Telephone: (702) 873-4100  
Facsimile: (702) 873-9966  
Email: cnewby@mcdonaldcarano.com

10 John B. Sganga, Jr. (Admitted *Pro Hac Vice*)  
11 Sean M. Murray (Admitted *Pro Hac Vice*)  
12 Joshua Stowell (Admitted *Pro Hac Vice*)  
13 Justin J. Gillett (Admitted *Pro Hac Vice*)  
**KNOBBE, MARTENS, OLSON & BEAR, LLP**  
2040 Main Street, Fourteenth Floor  
Irvine, CA 92614  
Phone: (949) 760-0404  
Facsimile: (949) 760-9502  
Email: john.sganga@knobbe.com  
Email: sean.murray@knobbe.com  
Email: joshua.stowell@knobbe.com  
Email: justin.gillett@knobbe.com

17 *Attorneys for Plaintiff, JS Products, Inc.*

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

Dated: January 17, 2018

**BUETHER JOE & CARPENTER, LLC**

/s/ Michael D. Ricketts  
Daniel T. Foley (Nevada State Bar No.1078)  
626 So. 8th Street  
Las Vegas, NV 89101  
**FOLEY & OAKES, PC**  
Telephone: (702) 384-2070  
Facsimile: (702) 384-2128  
Email: [Dan@foleyoakes.com](mailto:Dan@foleyoakes.com)

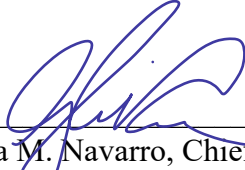
Eric W. Buether (*to be Admitted Pro Hac Vice*)  
Email: [Eric.Buether@BJCIPLaw.com](mailto:Eric.Buether@BJCIPLaw.com)  
Christopher M. Joe (*to be Admitted Pro Hac Vice*)  
Email: [Chris.Joe@BJCIPLaw.com](mailto:Chris.Joe@BJCIPLaw.com)  
Michael D. Ricketts (*to be Admitted Pro Hac Vice*)  
Email: [Mickey.Ricketts@BJCIPLaw.com](mailto:Mickey.Ricketts@BJCIPLaw.com)  
1700 Pacific Avenue, Suite 4750  
Dallas, TX 75201  
Telephone: (214) 466-1270  
Facsimile: (214) 635-1842

*Attorneys for Defendant, Roller Clutch Tools, LLC*

**ORDER**

**IT IS SO ORDERED.**

DATED this 18 day of January, 2018.

  
\_\_\_\_\_  
Gloria M. Navarro, Chief Judge  
UNITED STATES DISTRICT JUDGE

1 **CERTIFICATE OF SERVICE**

2 I HEREBY CERTIFY that I am an employee of McDonald Carano LLP, and that on  
3 January 17, 2018, I caused a true and correct copy of the foregoing **STIPULATION**  
4 **REGARDING EXTENSION OF TIME FOR PLAINTIFF TO RESPOND TO**  
5 **DEFENDANT’S MOTION TO DISMISS; AND TO REPLY TO ITS MOTION TO**  
6 **ENJOIN ROLLER CLUTCH FROM PROSECUTING CASE AGAINST DEFENDANT**  
7 **BEFORE THE EASTERN DISTRICT TO TEXAS**, to be served via the U.S. District Court’s  
8 Notice of Electronic Filing (“NEF”) in the above-captioned case to:

9  
10 Daniel T. Foley (Nevada State Bar No.1078)  
11 626 So. 8th Street  
12 Las Vegas, NV 89101  
13 Telephone: (702) 384-2070  
14 Facsimile: (702) 384-2128  
15 Email: Dan@foleyoakes.com

16 Eric W. Buether (*to be admitted pro hac vice*)  
17 Email: Eric.Buether@BJCIPLaw.com  
18 Christopher M. Joe (*to be admitted pro hac vice*)  
19 Email: Chris.Joe@BJCIPLaw.com  
20 Michael D. Ricketts (*to be admitted pro hac vice*)  
21 Email: Mickey.Ricketts@BJCIPLaw.com  
22 **BUETHER JOE & CARPENTER, LLC**  
23 1700 Pacific Avenue, Suite 4750  
24 Dallas, TX 75201  
25 Telephone: (214) 466-1270  
26 Facsimile: (214) 635-1842

27 *Attorneys for Defendant,*  
28 *Roller Clutch Tools, LLC*

29 */s/ Brian Grubb*  
30 \_\_\_\_\_  
31 An Employee of McDonald Carano LLP