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Swisstrax Corporation

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**SNAP LOCK INDUSTRIES, INC. a Utah  
corporation,

Plaintiff/Counter-Defendant,

vs.

SWISSTRAX CORPORATION., a California  
corporation,

Defendant/Counter-Claimant

Case No: 2:17-cv-02742-RFB-PAL

**JOINT STIPULATION AND [PROPOSED]  
ORDER TO EXTEND HEARING ON  
EMERGENCY MOTION FOR  
PROTECTIVE ORDER AND MOTION  
TO SEAL****(First Request)****AND ALL RELATED MATTERS.**

Defendant Swisstrax Corporation (“Swisstrax”) and Plaintiff Snap Lock Industries, Inc. (“Snap Lock”) (collectively, “Parties”), through their undersigned counsel, hereby respectfully jointly submit this Stipulation to extend the hearing on Emergency Motion for Protective Order (ECF No. 92) and Motion to Seal (ECF No. 97) and state as follows:

1. On December 18, 2018, Snap Lock filed its Emergency Motion for Protective Order Regarding Subpoenas (ECF No. 92).

2. On January 2, 2019, Swisstrax filed its Opposition to Snap Lock’s Emergency Motion for Protective Order Regarding Subpoenas (ECF No. 96) in conjunction with its Motion for Leave to File Under Seal Exhibits 4 and 6 to the Caloiaro Declaration in Support of

1 Swisstrax's Response to Emergency Motion for Protective Order (ECF No. 97).

2 3. On January 9, 2019, Snap Lock filed its Reply in Support of Motion for Protective  
3 Order (ECF No. 99).

4 4. On January 22, 2019, this Court entered its Notice Setting Hearing (ECF No. 100)  
5 on the Emergency Motion for Protective Order (ECF No. 92) and Motion to Seal (ECF No. 97).  
6 The Motion Hearing is currently set for February 12, 2019.

7 5. Counsel for Swisstrax has previous conflicts with the current Motion Hearing date  
8 that it is unable to reschedule. Due to previously scheduled conflicts, counsel for Snap Lock is  
9 thereafter unavailable from February 18, 2019, continuing through March 6, 2019.

10 6. Counsel for Swisstrax has scheduled depositions in the Northern District of Texas  
11 from February 11, 2019 to February 14, 2018. Counsel tried several times to move the  
12 depositions in light of the Court's notice of hearing, but was unable to do so due to the  
13 availability of the witness and the existing scheduling order in the action. Additionally, Counsel  
14 for Swisstrax subsequently has depositions scheduled to be taken in California from March 5,  
15 2019 to March 7, 2019 regarding an action in the District of Connecticut involving deponents  
16 traveling from Japan. The parties have negotiated these dates for several months and were only  
17 recently able to come to an agreement regarding the proposed dates.

18 7. Counsel for Snap Lock will be out of the jurisdiction from February 18, 2019, to  
19 March 6, 2019, in Minnesota and Florida for a scheduled business trip and family vacation.

20 8. Due to these significant scheduling conflicts, the Parties respectfully request that  
21 this Court extend the Motion Hearing to a date in which both parties are available.

22 9. Good cause exists and the Parties are not seeking the extension for undue delay.  
23 Instead, the parties are seeking an extension to promote judicial economy by ensuring that the  
24 Motion Hearing can be conducted with counsel most familiar with the case and relevant issues  
25 present and able to fully argue their respective positions.

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