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	Swisstrax Corporation	
9	UNITED STATES DISTRICT COURT	
10	DISTRICT OF NEVADA	
11	SNAP LOCK INDUSTRIES, INC. a Utah	Case No: 2:17-cv-02742-RFB-PAL
12	corporation,	
13	Plaintiff/Counter-Defendant,	IOINT CTIDIII ATION AND IDDODOCEDI
14	Traintin/Counter-Derendant,	JOINT STIPULATION AND [PROPOSED] ORDER TO EXTEND HEARING ON
15	VS.	EMERGENCY MOTION FOR PROTECTIVE ORDER AND MOTION
16	SWISSTRAX CORPORATION., a California	TO SEAL (First Request)
17		
18	Defendant/Counter-Claimant	
19	AND ALL RELATED MATTERS.	
20	Defendant Swisstrax Corporation ("Swisstrax") and Plaintiff Snap Lock Industries, Inc.	
21	("Snap Lock") (collectively, "Parties"), through their undersigned counsel, hereby respectfully	
22	jointly submit this Stipulation to extend the hearing on Emergency Motion for Protective Order	
23	(ECF No. 92) and Motion to Seal (ECF No. 97) and state as follows:	
24	1. On December 18, 2018, Snap Lock filed its Emergency Motion for Protective	
25	Order Regarding Subpoenas (ECF No. 92).	
26	2. On January 2, 2019, Swisstrax filed its Opposition to Snap Lock's Emergency	
27	Motion for Protective Order Regarding Subpoenas (ECF No. 96) in conjunction with its Motion	
28	for Leave to File Under Seal Exhibits 4 and 6 to the Caloiaro Declaration in Support of	



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

- 3. On January 9, 2019, Snap Lock filed its Reply in Support of Motion for Protective Order (ECF No. 99).
- 4. On January 22, 2019, this Court entered its Notice Setting Hearing (ECF No. 100) on the Emergency Motion for Protective Order (ECF No. 92) and Motion to Seal (ECF No. 97). The Motion Hearing is currently set for February 12, 2019.
- 5. Counsel for Swisstrax has previous conflicts with the current Motion Hearing date that it is unable to reschedule. Due to previously scheduled conflicts, counsel for Snap Lock is thereafter unavailable from February 18, 2019, continuing through March 6, 2019.
- 6. Counsel for Swisstrax has scheduled depositions in the Northern District of Texas from February 11, 2019 to February 14, 2018. Counsel tried several times to move the depositions in light of the Court's notice of hearing, but was unable to do so due to the availability of the witness and the existing scheduling order in the action. Additionally, Counsel for Swisstrax subsequently has depositions scheduled to be taken in California from March 5, 2019 to March 7, 2019 regarding an action in the District of Connecticut involving deponents traveling form Japan. The parties have negotiated these dates for several months and were only recently able to come to an agreement regarding the proposed dates.
- 7. Counsel for Snap Lock will be out of the jurisdiction from February 18, 2019, to March 6, 2019, in Minnesota and Florida for a scheduled business trip and family vacation.
- 8. Due to these significant scheduling conflicts, the Parties respectfully request that this Court extend the Motion Hearing to a date in which both parties are available.
- 9. Good cause exists and the Parties are not seeking the extension for undue delay. Instead, the parties are seeking an extension to promote judicial economy by ensuring that the Motion Hearing can be conducted with counsel most familiar with the case and relevant issues present and able to fully argue their respective positions.

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1 10. Therefore, the Parties respectfully request a continuance of the Motion Hearing, 2 to a date convenient to the Court's calendar after March 7, 2019. 3 Dated this 30<sup>th</sup> day of January 2019 4 5 DICKINSON WRIGHT PLLC DORSEY & WHITNEY LLP 6 /s/ Steven A. Caloiaro /s/ Tamara L. Kapaloski John L. Krieger Brett L. Foster 7 Steven A. Caloiaro Tamara L. Kapaloski 8 Dorsey & Whitney, LLP Christian T. Spaulding 8363 West Sunset Road, Suite 200 111 South Main Street, Suite 2100 9 Las Vegas, NV 89113 Salt Lake City, UT 84111-2176 Email: jkriger@dickinson-wright.com Telephone: 801-933-4082 10 Email: scaloiaro@dickinson-wright.com Email: foster.brett@dorsey.com Email: cspaulding@dickinson-wright.com Email: kapaloski.tammy@dorsey.com 11 12 **ORDER** 13 Good Cause appearing, the Motion Hearing is vacated and reset. The Motion Hearing 14 will be held on March 12, 2019 at 9:00 a.m. in Courtroom 3B. 15 IT IS SO ORDERED: 16 17 Hon. Peggy United States Magistrate Judge 18 DATED: February 5, 2019 19 20 21 22 23 24 25 26 27 28

