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11 *Attorneys for Plaintiff Snap Lock Industries, Inc.*

12 **UNITED STATES DISTRICT COURT**  
 13 **DISTRICT OF NEVADA**

14 **SNAP LOCK INDUSTRIES, INC.,**

15 Plaintiff,

16 vs.

17 **SWISSTRAX CORPORATION,**

18 Defendant.

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

**JOINT STIPULATED MOTION TO STAY  
 CASE DEADLINES PENDING  
 SETTLEMENT DISCUSSIONS AND  
 [PROPOSED] ORDER**

**(THIRD REQUEST)**

19  
 20 Plaintiff Snap Lock Industries, Inc. (“Snap Lock”) and Defendant Swisstrax Corporation  
 21 (“Swisstrax”) (collectively, “Parties”), through their undersigned counsel, hereby respectfully jointly  
 22 submit this Joint Stipulated Motion to Stay Case Deadlines Pending Settlement Discussions, and state  
 23 as follows:

24 1. Currently pending before this Court is Snap Lock’s Emergency Motion for Protective  
 25 Order Regarding Subpoenas (“Motion for Protective Order”). *See* ECF No. 92.

26 2. A hearing on the Motion for Protective Order is currently scheduled for March 12, 2019.  
 27 *See* ECF No. 106.

1 3. Also currently pending before this Court is Swisstrax's Motion to Compel. *See* ECF  
2 No. 102. The Motion to Compel is fully briefed, but a hearing on the motion has not been scheduled.

3 4. The deadline for completing expert discovery in this case is April 30, 2019, and the  
4 deadline for filing dispositive motions is May 30, 2019. *See* ECF No. 115. The Parties will take a total  
5 of six expert depositions and anticipate that both Parties will file one or more dispositive motions.

6 5. The Parties have agreed to engage in a settlement conference or mediation within the  
7 next 60 days, to be completed by May 6, 2019, in an attempt to resolve this dispute. To allow the  
8 parties to dedicate their efforts to the potential settlement of this dispute, and to preserve judicial and  
9 party resources in the event that settlement negotiations dispose of the case, the parties hereby jointly  
10 request that the Court stay all case deadlines to allow the Parties to conduct a settlement conference or  
11 mediation. The Parties therefore respectfully request that the deadlines for completing expert discovery  
12 and for filing dispositive motions be stayed, pending the conclusion of the settlement conference or  
13 mediation by or on May 6, 2019. The Parties request that a status conference be scheduled for as soon  
14 as possible after May 6, 2019, regarding case deadlines in the event that the parties are unable to resolve  
15 this dispute.

16 6. The Parties do not currently have a trial date.

17 7. Good cause exists for this request. Staying the case deadlines will preserve the  
18 resources of both the Court and the parties in the event that the ongoing settlement negotiations dispose  
19 of this dispute. The Parties are not seeking the extensions for purposes of undue delay.

20 Dated this 8th day of March, 2019.

21 DORSEY & WHITNEY LLP

22 /s/ Tamara L. Kapaloski

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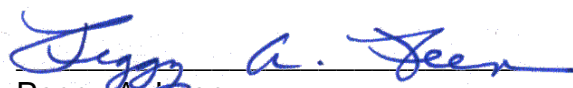
27 /s/ Steven A. Caloiaro

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1 **IT IS ORDERED** that the parties' Stipulation (ECF No. 116) is **GRANTED**.

2 **IT IS FURTHER ORDERED** that a telephonic status check is set for **10:00 a.m.**  
3 **March 26, 2019**, to check on the status of mediation. Counsel shall contact Courtroom  
4 Deputy Jeff Miller at (702) 464-5420 **no later than 4:00 p.m. March 22, 2019** to indicate  
a telephone number where counsel can be reached for the hearing.

5 Dated: March 14, 2019

6   
7 Peggy A. Leen  
8 United States Magistrate Judge

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 8<sup>th</sup> day of March, 2019, the foregoing **JOINT STIPULATED MOTION TO STAY CASE DEADLINES PENDING SETTLEMENT DISCUSSIONS AND [PROPOSED] ORDER** was served via e-mail upon the following:

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/s/ Tamara L. Kapaloski