

1 J. Stephen Peek  
 Nevada Bar No. 1758  
 2 HOLLAND & HART LLP  
 9555 Hillwood Drive, 2nd Floor  
 3 Las Vegas, NV 89134  
 Phone: (702) 222-2544  
 4 Fax: (702) 669-4650  
 speak@hollandhart.com  
 5 raloosvelt@hollandhart.com

6 Brett L. Foster (pro hac vice admission)  
 Tamara L. Kapaloski (pro hac vice admission)  
 7 DORSEY & WHITNEY LLP  
 111 S. Main Street Suite 2100  
 8 Salt Lake City, UT 84111-2176  
 Telephone: (801) 933-7360  
 9 Facsimile: (801) 933-7373  
 foster.brett@dorsey.com  
 10 kapaloski.tammy@dorsey.com

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  
 MEDIATION AND ORDER**

**(SECOND 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 Mediation, and state as follows:

23 1. On March 8, 2017, the Parties filed a Joint Stipulated Motion to Stay Case Deadlines  
 24 Pending Settlement Discussions (the “Stay Motion”) (ECF No. 116), advising the Court that the Parties  
 25 have agreed to engage in a settlement conference or mediation in an attempt to resolve this dispute,  
 26 and that they anticipated that the conference or mediation would be completed by May 6, 2019. The  
 27 Parties requested that the Court stay all case deadlines until after the settlement conference or mediation  
 28

1 in order to preserve resources of the Court and the Parties in the event that the settlement negotiations  
2 dispose of the dispute.

3 2. On March 14, 2019, the Court entered an order granting the Stay Motion. *See* ECF No.  
4 119.

5 3. Although the Parties subsequently agreed on a mediator and secured a mediation date,  
6 the mediation will not be concluded by May 6, 2019, as previously contemplated. The mediation is  
7 scheduled for June 7, 2019. As such, the Parties respectfully request that the stay of case deadlines be  
8 extended to June 14, 2019, to allow the Parties to dedicate their efforts to the potential settlement of  
9 this dispute, and to preserve judicial and party resources in the event that settlement negotiations  
10 dispose of the case. The Parties also request that a status conference regarding case deadlines be  
11 scheduled for as soon as possible after June 14, 2019, so that case scheduling may be resumed in the  
12 event the Parties are unable to resolve their dispute.

13 4. The Parties do not currently have a trial date.

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

17 Dated this 27th day of March, 2019.

18 DORSEY & WHITNEY LLP

DICKINSON WRIGHT PLLC

19 /s/ Tamara L. Kapaloski

/s/ Steven A. Caloiaro

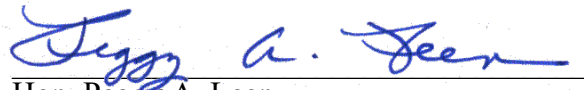
20 Brett L. Foster  
21 Tamara L. Kapaloski  
22 Dorsey & Whitney, LLP  
23 111 South Main Street, Suite 2100  
24 Salt Lake City, UT 84111-2176  
25 Email: foster.brett@dorsey.com  
26 Email: [kapaloski.tammy@dorsey.com](mailto:kapaloski.tammy@dorsey.com)

27 John L. Krieger  
28 Steven A. Caloiaro  
Christian T. Spaulding  
8363 West Sunset Road, Suite 200  
Las Vegas, NV 89113  
Email: jkrieger@dickinson-wright.com  
Email: scaloiaro@dickinson-wright.com  
Email: [cspaulding@dickinson-wright.com](mailto:cspaulding@dickinson-wright.com)

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

**IT IS SO ORDERED.**

**IT IS FURTHER ORDERED:** A status check and scheduling hearing is set for June 25, 2019, at 9:00 AM, before the assigned magistrate judge.



Hon. Peggy A. Leen  
United States Magistrate Judge

DATED: April 1, 2019