

1 **DICKINSON WRIGHT PLLC**
 John L. Krieger
 2 Nevada Bar No. 6023
 Email: jkrieger@dickinson-wright.com
 3 8363 West Sunset Road, Suite 200
 Las Vegas, Nevada 89113-2210
 4 Tel: (702) 550-4400

5 Steven A. Caloiaro
 Nevada Bar No. 12344
 6 Email: scaloiaro@dickinson-wright.com
 100 West Liberty Street, Suite 940
 7 Reno, NV 89501
 Tel: (775) 343-7500

8 Attorneys for Defendant/Counter-Claimant
 9 Swisstrax Corporation

10
 11 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

12 SNAP LOCK INDUSTRIES, INC. a Utah
 13 corporation,

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

14
 15 Plaintiff/Counter-Defendant,

16 vs.

UNOPPOSED MOTION AND
[PROPOSED] ORDER TO EXTEND
DEADLINES FOR DEFENDANT TO FILE
OBJECTIONS TO ORDER AND FOR
PLAINTIFF’S RESPONSE
(First Request)

17 SWISSTRAX CORPORATION., a California
 18 corporation,

19 Defendant/Counter-Claimant

20 AND ALL RELATED MATTERS.

21 Pursuant to LR IA 6-1, Defendant Swisstrax Corporation (“Swisstrax”), through its
 22 counsel of record, Dickinson Wright PLLC, hereby moves this Court for an Order extending the
 23 fourteen-day deadline for objections to the Order that the Court issued on December 20, 2019
 24 (ECF No. 143), and the fourteen-day deadline for any reply by Snap Lock Industries, Inc. (“Snap
 25 Lock”) to such objections, as set forth below. Objections to the Order (ECF No. 143) are
 26 currently due on or before January 3, 2020. Swisstrax respectfully requests that the deadline for
 27 all objections be extended to January 10, 2020, and the deadline for any response by Snap Lock



1 be extended to January 24, 2020.

2 The Court held a hearing on December 18, 2019 wherein the Court heard argument
3 regarding Snap Lock’s Motion for Protective Order (ECF No. 92) and Swisstrax’s Motion to
4 Compel (ECF No. 102). The Court entered a Minute Order on December 20, 2019, wherein the
5 Court ordered, inter alia, that Snap Lock’s Motion for Protective Order (ECF No. 92) is granted,
6 and Swisstrax’s Motion to Compel (ECF No. 102) is denied. (See ECF No. 143.) The Minute
7 Order provided that “The Court makes findings as to both rulings in open court.” (ECF No. 143.)

8 Swisstrax intends to file objections to the Court’s Minute Order (ECF No. 143) and, in
9 furtherance, immediately ordered transcripts of the proceedings. Due to the Christmas holiday,
10 Swisstrax did not receive the transcripts until Monday, December 30, 2019. Due to the extended
11 time needed for Swisstrax to obtain the transcripts of the December 18, 2019 Motion hearing,
12 and the intervening Christmas and New Year’s holidays, Swisstrax requests the proposed
13 adjustments so Swisstrax may adequately prepare its Objections pursuant to Local Rule IB 3-1,
14 and so Snap Lock may prepare any Responses to the same. Undersigned counsel discussed the
15 foregoing Motion with opposing counsel, and opposing counsel indicated that it would not
16 oppose this Motion. This is the first request for an extension of time to file objections to the
17 Order (ECF No. 143). This Motion is filed in good faith and not for the purpose of delay, but to
18 allow counsel sufficient time to review the transcript in order to draft the objection.

19 DATED this 2nd day of January, 2020.

20 **DICKINSON WRIGHT PLLC**

21 /s/ Steven A. Caloiaro
22 Steven A. Caloiaro
23 100 W. Liberty Sreet, Suite 940
24 Reno, NV 89523
25 Email: scaloiaro@dickinson-wright.com

26 **ORDER**

27 Based on the foregoing Unopposed Motion, and good cause appearing, IT IS HEREBY
28 ORDERED that the fourteen-day deadlines pursuant to Local Rules IB 3-1(a) for objections to

1 the Court's December 20, 2019 Order, and for any response by Snap Lock, are extended as
2 follows: any objections to the Order are due on or before January 10, 2020, and any response to
3 any such objections is due on or before January 24, 2020.

4 IT IS SO ORDERED.

5 DATED: 1/3/20



6
7 Hon. Brenda Weksler
United States Magistrate Judge

8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28