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8 *Attorneys for Charles M. Hallinan  
 and Hallinan Capital Corp.*

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 THOMAS W. MCNAMARA, as the Court-  
 12 Appointed Monitor for AMG Capital  
 Management, LLC; BA Services LLC; Black  
 13 Creek Capital Corporation; Broadmoor Capital  
 Partners, LLC; Park 269, LLC; C5 Capital  
 14 LLC; DF Services Corp.; DFTW Consolidated  
 [UC] LLC; Impact BP LLC; Level 5 Apparel  
 15 LLC; Level 5 Capital Partners LLC; Level 5  
 Eyewear LLC; Level 5 Motorsports, LLC;  
 16 Level 5 Scientific LLC; NM Service Corp.  
 (f/k/a/ National Money Service); PSB Services  
 17 LLC; Real Estate Capital LLC (f/k/a/ Rehab  
 Capital I, LLC); Sentient Technologies; ST  
 18 Capital LLC; Westfund LLC; Eclipse  
 Renewables Holdings LLC; Scott Tucker  
 19 Declaration of Trust, dated February 20, 2015;  
 West Race Cars, LLC; and Level 5  
 20 Management LLC; and their successors,  
 assigns, affiliates, and subsidiaries,

22 Plaintiff,

23 v.

24 CHARLES M. HALLINAN, an individual;  
 HALLINAN CAPITAL CORP., a Delaware  
 25 corporation; DOES I-X; and ROE  
 CORPORATIONS I-X,

26 Defendants.  
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Case No. 2:17-cv-02966-KJD-NJK

**STIPULATION AND ORDER TO  
 EXTEND THE DEADLINE FOR  
 DEFENDANTS TO FILE  
 RESPONSIVE PLEADING TO  
 COMPLAINT**

**(First Request)**

1 Plaintiff, Court-Appointed Monitor Thomas W. McNamara ("Plaintiff"), by and through  
2 his counsel, Michael F. Lynch of the Lynch Law Practice, PLLC and Edward Chang and Logan  
3 Smith of McNamara Smith LLP and Defendants Charles M. Hallinan and Hallinan Capital Corp.  
4 ("Defendants"), by and through their counsel, Jarrod L. Rickard of Semenza Kircher Rickard,  
5 hereby stipulate to the following:

- 6 1. That the deadline for Defendants to file their responsive pleading to Plaintiff's  
7 Complaint, filed on November 29, 2017, is currently scheduled on the Docket for  
8 December 28, 2017;
- 9 2. That Defendants require additional time beyond the current deadline in light of the  
10 following: (i) Defendants' undersigned counsel was only recently retained on or about  
11 December 22, 2017; (ii) this matter involves novel issues of fact and law; (iii)  
12 Defendants' counsel has pre-existing travel plans for the holidays; and (iv) Defendants'  
13 counsel has other client commitments;
- 14 3. Therefore, Defendants shall have up to and including January 29, 2018 to file their  
15 response to Plaintiff's Complaint.

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1 Dated this 29th day of December 2017.

2 SEMENZA KIRCHER RICKARD

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4 /s/Jarrold L Rickard  
Jarrod L. Rickard, Esq.  
5 Nevada Bar No. 10203  
10161 Park Run Drive, Suite 150  
6 Las Vegas, NV 89145

7 *Attorneys for Charles M. Hallinan*  
8 *and Hallinan Capital Corp.*

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**IT IS SO ORDERED.**

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UNITED STATES MAGISTRATE JUDGE

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Dated: January 2, 2018

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Dated this 29th day of December 2017.

LYNCH LAW PRACTICE, PLLC

/s/ Michael F. Lynch  
Michael F. Lynch (NV 8555)  
3613 S. Eastern Ave.  
Las Vegas, Nevada 89169

Logan Smith  
(will comply with LR IA 11-2 within 10 days)  
Edward Chang (NV 11783)  
MCNAMARA SMITH LLP  
655 West Broadway, Suite 1600  
San Diego, California 92101

*Attorneys for Thomas W. McNamara, in his  
capacity as Court-Appointed Monitor*