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

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

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

25 Plaintiff,

26 v.

27 CHARLES M. HALLINAN, an individual;

GMN

Case No. 2:17-cv-02966-~~KJD~~-NJK

**DEFENDANTS' UNOPPOSED  
MOTION TO CONTINUE DEADLINE  
TO RESPOND TO MONITOR'S  
MOTION TO COMPEL DISCOVERY  
FROM DEFENDANT HALLINAN  
CAPITAL CORP. (ECF NO. 68)**

**(FIRST REQUEST)**

SEMENTA KIRCHER RICKARD  
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1 HALLINAN CAPITAL CORP., a Delaware  
2 corporation; DOES I-X; and ROE  
CORPORATIONS I-X,

3 Defendants.  
4

5 Defendants Charles M. Hallinan and Hallinan Capital Corp. ("Defendants") hereby  
6 request a brief extension, until February 1, 2018, to file their Response to Plaintiff Court-  
7 Appointed Monitor Thomas W. McNamara's ("Plaintiff") Motion Compel Discovery from  
8 Defendant Hallinan Capital Corp. (ECF No. 68). Currently, Defendants' Response is due January  
9 28, 2019.

10 Defendants' counsel has the current conflicts, among others, that necessitate a brief  
11 extension of the Response deadline: (1) Defendants' lead counsel has a deadline in another matter  
12 which requires counsel's immediate attention on January 25, 2019; (2) Due to childcare  
13 obligations on January 26-27, 2019; (3) Defendants' lead counsel is precluded from working on  
14 Defendants' Response during this time; (4) On January 30, 2019, counsel for Plaintiff and  
15 Defendants will both be attending the scheduled deposition of Linda Hallinan and Defendants'  
16 lead counsel will be unable to work on Defendants' Response; (5) Defendants' lead counsel is  
17 scheduled to be in Baltimore, MD for an appellate oral hearing before the Circuit Court for  
18 Montgomery County, Maryland, on Thursday January 31, 2019, and New York, NY for a motion  
19 hearing before the Supreme Court of New York, Bronx County, on February 1, 2019.  
20 Defendants' lead counsel's preparation for the aforementioned hearings is required in the  
21 preceding days.

22 In anticipation of filing this Motion, Defendants' counsel reached out to Plaintiff's counsel.  
23 Plaintiff's counsel confirmed that Plaintiff does not oppose an extension until Wednesday,  
24 January 30, 2019, and takes no position with respect to moving the deadline to February 1, 2019.

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1 Based upon the foregoing stated conflicts with Defendants' lead counsel's schedule and no  
2 open objection by Plaintiff, Defendants submit that good cause exists to move the Response  
3 deadline to February 1, 2019.

4 DATED this 25th day of January, 2019.

5 SEMENZA KIRCHER RICKARD

6  
7 /s/ Jarrod L. Rickard

8 Lawrence J. Semenza, III, Esq., Bar No. 7174

9 Christopher D. Kircher, Esq., Bar No. 11176

10 Jarrod L. Rickard, Esq., Bar No. 10203

11 10161 Park Run Drive, Suite 150

12 Las Vegas, Nevada 89145

13 *Attorneys for Defendants,*

14 *Charles M. Hallinan and Hallinan Capital Corp.*

15  
16  
17 IT IS SO ORDERED.

18 Dated: January 28, 2019

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Nancy J. Koppe

22 United States Magistrate Judge  
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