

1 Logan Smith
 (admitted pro hac vice)
 2 lsmith@mcnamarallp.com
 Edward Chang (NV 11783)
 3 echang@mcnamarallp.com
 MCNAMARA SMITH LLP
 4 655 West Broadway, Suite 1600
 San Diego, California 92101
 5 Tel.: 619-269-0400
 Fax: 619-269-0401

Michael F. Lynch
 Nevada Bar No. 8555
 Michael@LynchLawPractice.com
 LYNCH LAW PRACTICE, PLLC
 3613 S. Eastern Ave.
 Las Vegas, Nevada 89169
 Tel.: 702-684-6000
 Fax: 702-543-3279

Attorneys for Court-Appointed Monitor

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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

Plaintiffs,

v.

20 SELLING SOURCE, LLC; PARTNERWEEKLY
 21 L.L.C.; MONEYMUTUAL, LLC; DATAx,
 LTD.; LONDON BAY CAPITAL LLC;
 22 LONDON BAY TSS HOLDING COMPANY,
 LLC; LONDON BAY-TSS ACQUISITION
 23 COMPANY, LLC; DEREK LAFAVOR; GLENN
 MCKAY; DOES IX; and ROE
 24 CORPORATIONS I-X,

Defendants.

Case No. 2:17-cv-02969-JAD-CWH

STIPULATION:

(1) TO EXTEND TIME FOR DEFENDANT DEREK LAFAVOR TO RESPOND TO COMPLAINT;

AND,

(2) TO EXTEND TIME FOR THOMAS W. MCNAMARA TO FILE HIS RESPONSE TO MR. LAFAVOR'S [ANTICIPATED] MOTION TO DISMISS

(FIRST REQUEST)

ORDER

26 Plaintiff, Thomas W. McNamara ("Plaintiff") in his capacity as court-appointed Monitor,
 27 and Defendant Derek LaFavor ("Defendant") stipulate and agree:

28 ///

1 WHEREAS, the Complaint in this case was filed on November 29, 2017, Defendant was
2 personally and properly served with process in full accord with Fed. R. Civ. Proc. 4 on January
3 30, 2018, and Defendant's deadline to respond to the Complaint passed on February 20, 2018
4 (ECF No. 16);

5 WHEREAS, the parties stipulate and agree, subject to Court approval, that Defendant's
6 deadline to file his response to the Complaint shall be extended to March 26, 2018;

7 WHEREAS, the parties stipulate and agree, subject to Court approval, that should the
8 Defendant's initial response to the Complaint be a motion to dismiss, as anticipated by the
9 parties, that Plaintiff's deadline to file its response to said motion to dismiss shall be extended to
10 April 30, 2018; and

11 WHEREAS, this is the parties' first stipulation to extend either of these deadlines,

12 The parties respectfully stipulate, agree, and request that the Court grant this stipulation.

13 Dated March 6, 2018.

Dated March 6, 2018.

14 **COOK & KELESIS, LTD.**

LYNCH LAW PRACTICE, PLLC

15 /s/ Marc P. Cook
16 Nevada Bar No. 4574
17 517 S. 9th Street
18 Las Vegas, NV 89101
19 (702) 737-7702
20 (702) 385-3788 (fax)
21 mcook@bckltd.com

/s/ Michael F. Lynch
Nevada Bar No. 8555
3613 S. Eastern Ave.
Las Vegas, Nevada 89169

22 Attorneys for Defendant
23 Derek LaFavor

Logan D. Smith
(admitted pro hac vice)
Edward Chang
Nevada Bar No. 11783
MCNAMARA SMITH LLP
655 West Broadway, Suite 1600
San Diego, CA 92101

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

26 **IT IS SO ORDERED.**

27 
28 _____
UNITED STATES DISTRICT JUDGE

Dated: March 6, 2018.