

1 Christopher R. Miltenberger
 Nevada Bar No. 10153
 2 GREENBERG TRAUERIG, LLP
 3773 Howard Hughes Parkway, Suite 400 North
 3 Las Vegas, Nevada 89169
 Telephone: (702) 792-3773
 4 Facsimile: (702) 792-9002
 Email: miltenbergerc@gtlaw.com

5
 6 *Counsel for Defendants Leica Microsystems, Inc.,
 and Steve Milazzo*

7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 JOSEPH FIORAVANTE, an individual;
 MODERN ORTHOPAEDICS, LLC, a
 Nevada corporation,

11 Plaintiffs,

12 v.

13 LEICA MICROSYSTEMS, INC., a
 Delaware corporation; SOUTH RIDGE
 14 MICROSURGICAL, INC., a Utah
 corporation; STEVE MILAZZO, an
 15 individual (California); BRANDON
 ELGGREN, an individual (Utah); DOES I
 16 through X, inclusive; and ROE
 CORPORATIONS I through X, inclusive,

17 Defendants.
 18

Case No. 2:18-cv-00059-GMN-CWH

**STIPULATION AND [PROPOSED]
 ORDER TO EXTEND DEADLINE FOR
 DEFENDANTS LEICA
 MICROSYSTEMS, INC. AND STEVE
 MILAZZO TO RESPOND TO
 AMENDED COMPLAINT**

(First Request)

19 Pursuant to LR IA 6-1, LR IA 6-2, and LR 7-1, Defendants Leica Microsystems, Inc.
 20 (“Leica”) and Steve Milazzo (“Milazzo”) and Plaintiffs Joseph Fioravante and Modern
 21 Orthopaedics, LLC (collectively, “Plaintiffs”), by and through their respective counsel, hereby
 22 agree and to extend the deadline for the Leica and Milazzo to plead or otherwise respond to
 23 Plaintiffs’ Amended Complaint (ECF No. 3) until March 26, 2018, and request that the Court
 24 enter an Order approving the same.

25 On January 30, 2018, Milazzo was served with process with respect to the Amended
 26 Complaint in the above-captioned matter. On February 1, 2018, Leica was served with process
 27 with respect to the Amended Complaint in the above-captioned matter. Leica and Milazzo
 28 recently obtained counsel and have requested an extension of time of approximately thirty (30)

1 days in order to evaluate the allegations set forth in the Amended Complaint and the factual
2 circumstances underlying such allegations. Plaintiffs are agreeable to the requested extension as
3 a matter of professional courtesy. This is the parties' first stipulation for an extension of time for
4 Defendants Leica and Milazzo to respond to the Amended Complaint.

5 Based on the foregoing, the parties respectfully request that the Court enter an order
6 extending the deadline for Leica and Milazzo to plead or otherwise respond to the Amended
7 Complaint until March 26, 2018.

8 Dated: February 16, 2018

Dated: February 16, 2018

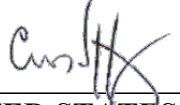
9
10 By: /s/ Christopher R. Miltenberger
Christopher R. Miltenberger
11 Nevada Bar No. 10153
GREENBERG TRAUIG, LLP
12 3773 Howard Hughes Parkway
Suite 400 North
13 Las Vegas, NV 89169

By: /s/ M. Lani Esteban-Trinidad
M. Lani Esteban-Trinidad
14 Nevada Bar No. 6967
THE THATER LAW GROUP, P.C.
15 6390 W. Cheyenne Ave, Ste. A
Las Vegas, Nevada 89108

16 *Attorney for Defendants Leica
Microsystems, Inc. and Steve Milazzo*

*Attorneys for Plaintiffs Joseph Fioravante
and Modern Orthopaedics, LLC*

17 **IT IS SO ORDERED:**



18
19 **UNITED STATES
MAGISTRATE/DISTRICT JUDGE**

20 **DATED:** February 23, 2018