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12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 SECURITIES AND EXCHANGE
15 COMMISSION,

16 Plaintiff,

17 vs.

18 QUICKSILVER STOCK TRANSFER,
19 LLC and ALAN SHINDERMAN,

20 Defendants.

Case No. 2:18-cv-00131-JCM-PAL

**JOINT STIPULATION AND MOTION
BY PLAINTIFF SECURITIES AND
EXCHANGE COMMISSION AND
DEFENDANTS QUICKSILVER
STOCK TRANSFER LLC AND ALAN
SHINDERMAN TO EXTEND
DEADLINES FOR FILING
DISPOSITIVE MOTIONS AND
JOINT PRETRIAL ORDER IN
LIGHT OF SETTLEMENT IN
PRINCIPLE**

(FIRST REQUEST)

1 Plaintiff Securities and Exchange Commission (“SEC”) and Defendants
2 Quicksilver Stock Transfer LLC and Alan Shinderman (“Defendants”), through
3 their respective counsel, hereby stipulate and move the Court to extend the
4 deadlines for filing dispositive motions and the Proposed Joint Pretrial Order in
5 this action by 60 days.

6 WHEREAS, counsel for the SEC and counsel for Defendants have agreed to a
7 settlement in principle of this action;

8 WHEREAS, only the Commissioners of the SEC in Washington, D.C. have the
9 final authority to approve any settlement, SEC counsel has begun the process of
10 obtaining final settlement approval and authorization from the SEC Commissioners,
11 any Consent and Proposed Final Judgment as to Defendants cannot be filed until SEC
12 counsel has obtained such authority from the Commission, and under the present
13 circumstances, that process is expected to take approximately 60 days;

14 WHEREAS, the current deadline for filing dispositive motions is March 13,
15 2019, and the deadline for filing the Proposed Joint Pretrial Order is April 12, 2019;

16 WHEREAS, Defendants and the SEC seek to minimize burden, fees, costs,
17 and/or other expenses of preparation for a trial on the claims asserted against
18 Defendants pending the Commission’s consideration of the SEC’s and Defendants’
19 settlement in principle;

20 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED by
21 counsel for the SEC and counsel for Defendants the deadline for filing dispositive
22 motions and the Proposed Joint Pretrial Order be extended 60 days to allow the
23 Commission consider and approve the settlement in principle.

24
25 DATED: March 13, 2019

/s/ Donald W. Searles

DONALD W. SEARLES
Attorneys for Plaintiff
Securities and Exchange Commission

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DATED: March 13, 2019

/s/ Barney C. Ales
BARNEY C. ALES
Attorneys for Defendants
Quicksilver Stock Transfer, LLC and
Alan Shinderman

IT IS SO ORDERED.

Dated: March 20, 2019


HON. PEGGY A. LEEN
UNITED STATES MAGISTRATE JUDGE

PROOF OF SERVICE

I am over the age of 18 years and not a party to this action. My business address is:

U.S. SECURITIES AND EXCHANGE COMMISSION,
444 S. Flower Street, Suite 900, Los Angeles, California 90071
Telephone No. (323) 965-3998; Facsimile No. (213) 443-1904.

On March 13, 2019, I caused to be served the document entitled **JOINT STIPULATION AND MOTION BY PLAINTIFF SECURITIES AND EXCHANGE COMMISSION AND DEFENDANTS QUICKSILVER STOCK TRANSFER LLC AND ALAN SHINDERMAN TO EXTEND DEADLINES FOR FILING DISPOSITIVE MOTIONS AND JOINT PRETRIAL ORDER IN LIGHT OF SETTLEMENT IN PRINCIPLE (FIRST REQUEST)** on all the parties to this action addressed as stated on the attached service list:

OFFICE MAIL: By placing in sealed envelope(s), which I placed for collection and mailing today following ordinary business practices. I am readily familiar with this agency’s practice for collection and processing of correspondence for mailing; such correspondence would be deposited with the U.S. Postal Service on the same day in the ordinary course of business.

PERSONAL DEPOSIT IN MAIL: By placing in sealed envelope(s), which I personally deposited with the U.S. Postal Service. Each such envelope was deposited with the U.S. Postal Service at Los Angeles, California, with first class postage thereon fully prepaid.

EXPRESS U.S. MAIL: Each such envelope was deposited in a facility regularly maintained at the U.S. Postal Service for receipt of Express Mail at Los Angeles, California, with Express Mail postage paid.

HAND DELIVERY: I caused to be hand delivered each such envelope to the office of the addressee as stated on the attached service list.

UNITED PARCEL SERVICE: By placing in sealed envelope(s) designated by United Parcel Service (“UPS”) with delivery fees paid or provided for, which I deposited in a facility regularly maintained by UPS or delivered to a UPS courier, at Los Angeles, California.

ELECTRONIC MAIL: By transmitting the document by electronic mail to the electronic mail address as stated on the attached service list.

E-FILING: By causing the document to be electronically filed via the Court’s CM/ECF system, which effects electronic service on counsel who are registered with the CM/ECF system.

FAX: By transmitting the document by facsimile transmission. The transmission was reported as complete and without error.

I declare under penalty of perjury that the foregoing is true and correct.

Date: March 13, 2019

/s/ Donald W. Searles

Donald W. Searles

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SEC v. Quicksilver Stock Transfer LLC and Alan Shinderman
United States District Court – District of Nevada
Case No. 2:18-cv-00131-JCM-PAL

SERVICE LIST

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