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8 Attorneys for Defendants Dom Rubino Consulting Services, Inc.
9 And BizStratPlan Inc.

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 FOCALPOINT INTERNATIONAL, INC.

Case No.: 2:18-cv-00236-APG-PAL

13 Plaintiff,

14 vs.

15 DOM RUBINO CONSULTING SERVICES,
INC. and BIZSTRATPLAN INC.

**STIPULATION AND [PROPOSED]
ORDER FOR EXTENSION OF TIME
FOR DEFENDANTS' TO FILE AN
ANSWER AND COUNTERCLAIMS**

16 Defendants.

[SECOND REQUEST]

17
18
19 **STIPULATION**

20 Plaintiff FocalPoint International, Inc., and Defendants Dom Rubino Consulting Services,
21 Inc., and BizStratPlan, Inc. (collectively, "Defendants"), by and through their counsel of record,
22 hereby stipulate to extend the deadline for Defendants to file their answer and counterclaims in
23 response to FocalPoint's Complaint. Specifically, the parties agree that Defendants' current May
24 21, 2018 deadline will be extended to May 29, 2018. This is the second request for extension of
25 this deadline.

26 The parties have reached a tentative agreement on the disputed jurisdictional issues and are
27 presently finalizing a stipulation and proposed order that will resolve that jurisdictional dispute,
28 and allow the action to proceed here. Defendants desire to have that jurisdictional stipulation and

1 order submitted before answering the jurisdictional allegations in the complaint and asserting
2 jurisdictional allegations in the counterclaims.

3 DATED this 21st day of May, 2018.

DATED this 21st day of May, 2018.

4 GREENBERG TRAURIG LLP

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6 By: /s/ Jacob Bundick

By: /s/ Brian Blakley

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Attorneys for Plaintiff

Attorneys for Defendants

11 **ORDER**

12 IT IS HEREBY ORDERED that Defendants' answer and counterclaims are due on May
13 29, 2018.

14 IT IS SO ORDERED.

16 
17 UNITED STATES MAGISTRATE JUDGE

18 Dated: May 22, 2018

19
20 Respectfully Submitted By:

21 LEWIS ROCA ROTHGERBER CHRISTIE LLP

23 By: /s/ Brian Blakley

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