

1 Kara B. Hendricks (NV SBN 7743)  
 Christopher R. Miltenberger (NV SBN 10153)  
 2 GREENBERG TRAUERIG, LLP  
 3 3773 Howard Hughes Parkway, Suite 400 North  
 Las Vegas, NV 89169  
 4 Telephone: (702) 792-3773  
 hendricksk@gtlaw.com  
 5 miltenbergerc@gtlaw.com

6 Christopher Tayback (CA SBN 145532, admitted *pro hac vice*)  
 Michael L. Fazio (CA SBN 228601, admitted *pro hac vice*)  
 7 QUINN EMANUEL URQUHART & SULLIVAN, LLP  
 8 865 South Figueroa Street, 10th Floor  
 Los Angeles, California 90017-2543  
 9 Telephone: (213) 443-3000  
 christayback@quinnemanuel.com  
 10 michaelfazio@quinnemanuel.com

11 *Attorneys for Defendant Jinro America, Inc.*

12  
 13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 GOLD WATER TRADING CORPORATION, a  
 Nevada corporation,

16  
 17 Plaintiff,

18 vs.

19 JINRO AMERICA, INC., a foreign corporation;  
 DOES I-X, inclusive; and ROE Corporations and  
 20 Limited Liability Companies I-X, inclusive,

21 Defendants.

CASE NO. 2:18-cv-00257 JAD-VCF

**STIPULATION AND ORDER: (1)  
 SETTING DEADLINE FOR  
 PLAINTIFF TO FILE FIRST  
 AMENDED COMPLAINT; AND (2)  
 SETTING DEADLINE FOR  
 DEFENDANTS TO RESPOND TO  
 FIRST AMENDED COMPLAINT**

**(FIRST REQUEST)**

22  
 23 Pursuant to LR IA 6-1, LR IA 6-2, LR 7-1, and FRCP 15(a)(2), Defendant Jinro America,  
 24 Inc. (“JAI”) and Plaintiff Gold Water Trading Corporation (“Gold Water”), by and through their  
 25 respective counsel of record, hereby agree and stipulate to permit Gold Water to file its First  
 26 Amended Complaint on or before April 12, 2018, to extend JAI’s deadline to respond to Gold  
 27 Water’s First Amended Complaint to April 27, 2018, and request that the Court enter an order

1 approving the same.

2 Gold Water filed its Complaint in this matter in the Eighth Judicial District Court, Clark  
3 County, Nevada on January 31, 2018. JAI removed the action to this Court on February 12, 2018  
4 (ECF No. 1). Plaintiff did not move to remand this action.

5 On February 16, 2018, Gold Water filed an Emergency Motion for Temporary Restraining  
6 Order and Preliminary Injunction (the “Motion”) (ECF No. 7). JAI filed its Opposition to the  
7 Motion on February 21, 2018 (ECF No. 9). Gold Water filed its Reply in support of its Motion on  
8 February 28, 2018 (ECF No. 17). On March 6, 2018, the Court entered an Order Denying the relief  
9 sought in the Motion (the “Order”). (ECF No. 20). In the Order, the Court noted that certain “new  
10 evidence might cause Gold Water to seek to amend its pleading.” *See* Order, ECF No. 20, 6:1-2.

11 Subsequent to the issuance of the Order, the parties conducted a telephonic meet and confer  
12 with respect to the status of this action. During this meet and confer, Gold Water indicated that it  
13 intended to amend its Complaint. In the interests of judicial economy and to reduce the need for the  
14 parties to file unnecessary documents with the Court, the parties discussed a briefing schedule to  
15 allow Gold Water to file its First Amended Complaint and for JAI to file its response to Gold  
16 Water’s First Amended Complaint.

17 Based on the foregoing, and pursuant to FRCP 15(a)(2), the parties respectfully request that  
18 the Court enter an order as contemplated by the parties during their meet and confer, as follows:

19 1. Gold Water shall have up to and including **April 12, 2018**, in which to file and serve  
20 its First Amended Complaint;

21 2. JAI shall not have to serve any response to Gold Water’s existing Complaint on file  
22 herein until after the First Amended Complaint is filed;

23 3. JAI shall have up to and including **April 27, 2018**, in which to answer or otherwise  
24 respond to Gold Water’s First Amended Complaint.

25 This stipulation is entered into in good faith and is not intended to delay these proceedings.  
26 Instead, this stipulation will further the interests of justice and judicial efficiency. Nor will any party  
27 in the action be prejudiced by this stipulation as all parties are in agreement with respect to this  
28

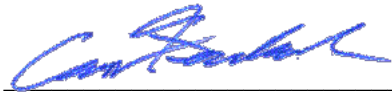
1 briefing schedule. Based on the foregoing, good cause exists to enter the order extending the  
2 parties' briefing schedule and deadlines as contemplated herein and the parties respectfully request  
3 that the Court enter an order approving the same.

4 This is the parties' first request for an extension of time for either Gold Water to submit an  
5 amended pleading or for JAI to serve a response to any Complaint.

6 7 8 9 10 11 12 13 14 15 16 17 18	Dated this 13th day of March, 2018.  GREENBERG TRAUIG, LLP  <u>/s/ Christopher R. Miltenberger</u> Christopher R. Miltenberger (NVSBN 10153) Kara B. Hendricks (NVSBN 7743) 3773 Howard Hughes Parkway Suite 400 North Las Vegas, NV 89169  Christopher Tayback (CA SBN 145532, admitted <i>pro hac vice</i> ) Michael L. Fazio (CA SBN 228601, admitted <i>pro hac vice</i> ) QUINN EMANUEL URQUHART & SULLIVAN, LLP 865 South Figueroa Street, 10th Floor Los Angeles, California 90017-2543  <i>Attorneys for Defendant Jinro America, Inc.</i>	Dated this 13th day of March, 2018.  THE LAW OFFICE OF KAREN H. ROSS  <u>/s/ Karen H. Ross</u> Karen H. Ross (NVSBN 9299) 2275 Corporate Circle, Suite 160 Henderson, Nevada 89074  Louis E. Garfinkel (NVSBN 3416) LEVINE, GARFINKEL & ECKERSLEY 2965 S. Jones Blvd., Suite C1-140 Las Vegas, Nevada 89146  <i>Attorneys for Plaintiff Gold Water Trading Corporation</i>
------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**IT IS SO ORDERED:**



**UNITED STATES MAGISTRATE/DISTRICT  
JUDGE**

**DATED:** 3-14-2018 \_\_\_\_\_