

1 Louis E. Garfinkel, Esq.
 Nevada Bar No. 3416
 2 LEVINE & GARFINKEL
 3 1671 W. Horizon Ridge Pkwy, Suite 230
 Henderson, NV 89012
 4 Tel: (702) 735-0451
 Fax: (702) 735-0198
 5 Email: lgarfinkel@lgealaw.com

6 D. Bryce Finley, Esq.
 Nevada Bar No. 9310
 7 THE LAW OFFICE OF KAREN H. ROSS
 2275 Corporate Circle, Suite 160
 8 Henderson, Nevada 89074
 9 Tel: (702) 485-4152
 Fax: (702) 485-4125
 10 Email: karenross@khrlawgroup.com

11 *Attorneys for Plaintiff Gold Water Trading Corporation*

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

15 GOLD WATER TRADING CORPORATION, a
 16 Nevada corporation,

17 Plaintiff,

18 vs.

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

22 Defendants.

Case No.: 2:18-cv-00257-JAD-VCF

**STIPULATION AND ORDER TO
 EXTEND TIME TO RESPOND TO
 SUMMARY JUDGMENT MOTIONS**

(FIRST REQUEST)

[ECF No. 58]

23 Pursuant to LR IA 6-1, it is stipulated by and between the parties, through undersigned
 24 counsel, as follows:

- 25 1. On January 14, 2019, Defendant Jinro America, Inc. (“Jinro”) filed its Motion for
 26 Summary Judgment [ECF 55], and Plaintiff Gold Water Trading Corporation’s (“Gold Water”)
 27 response is due by February 4, 2019.
 28

1 2. On January 17, 2019, Defendant Wang Globalnet (“Wang”) filed its Joinder in
2 Jinro’s Motion for Summary Judgment [ECF 56].

3 3. On January 17, 2019, Defendant Wang filed its Motion for Summary Judgment
4 [ECF 57], and Plaintiff Gold Water’s response is due by February 7, 2019.

5 4. Because Gold Water’s counsel was recently ill and because of scheduling
6 conflicts, Gold Water is requesting an extension of time to respond to the Motions for Summary
7 Judgment filed by Jinro and Wang.

8 5. Gold Water shall have up to and including February 20, 2019, in which to respond
9 to the Motions for Summary Judgment filed by Jinro and Wang.

10 This Stipulation is entered into in good faith and is not intended to delay these
11 proceedings. The parties will not be prejudiced by this Stipulation and the parties are in
12 agreement with respect to the extension of time. Based on the foregoing, good cause exists to
13 extend Gold Water’s time to respond to the Motions for Summary Judgment filed by Jinro and
14 Wang.
15

16 Dated this 23rd day of January, 2019.

17 Dated this 23rd day of January, 2019.

18 LEVINE & GARFINKEL

19 GREENBERG TRAURIG LLP

20 /s/ *Louis E. Garfinkel*

21 /s/ *Michael L. Fazio*

22 By: _____
23 Louis E. Garfinkel, Esq.
24 Nevada Bar No. 3416
25 1671 W. Horizon Ridge Pkwy, Suite 230
26 Henderson, NV 89012

27 By: _____
28 Kara B. Hendricks, Esq.
29 Christopher R. Miltenberger, Esq.
30 3 773 Howard Hughes Pkwy, Ste 400 North
31 Las Vegas, NV 89169

32 And
33 D. Bryce Finley, Esq.
34 Nevada Bar No. 9310
35 THE LAW OFFICE OF KAREN H. ROSS
36 2275 Corporate Circle, Suite 160
37 Henderson, Nevada 89074
38 Attorneys for Plaintiff Gold Water Trading
39 Corporation

40 And
41 Christopher Tayback, Esq.
42 Michael L. Fazio, Esq.
43 Quinn Emanuael Urquhart & Sullivan, LLP
44 865 S. Figueroa Street, 10th Floor
45 Los Angeles, CA 90017-2543
46 Attorneys for Defendant Jinro America, Inc.

1 Dated this 23rd day of January, 2019.

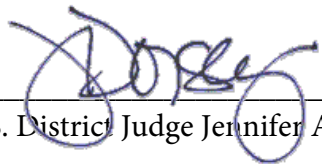
2 SEMENZA KIRCHER RICKARD

3 /s/ Jarrod L. Rickard

4 By: _____
5 Lawrence J. Semenza, III, Esq.
6 Christopher D. Kircher, Esq.
7 Jarrod L. Rickard, Esq.
8 10161 Park Run Dr., Suite 150
9 Las Vegas, NV 89146
10 *Attorneys for Defendant Wang GlobalNet*

11 IT IS HEREBY ORDERED that the parties' stipulation [ECF No. 58] is **GRANTED**.
12 Plaintiff's time to respond to defendants' summary-judgment motions [ECF Nos. 55, 57] is
13 **EXTENDED** to February 20, 2019.

14 Dated: February 1, 2019

15 
16 _____
17 U.S. District Judge Jennifer A. Dorsey

18
19
20
21
22
23
24
25
26
27
28