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13 **IN THE UNITED STATES DISTRICT COURT**
 14 **DISTRICT OF NEVADA**

16 ALADDIN’S EATERY SYSTEMS, INC., an)	CASE NO: 2:18-CV-00412 APG-GWF
Ohio corporation,)	
17)	Judge Andrew P. Gordon
Plaintiff,)	Magistrate George Foley, Jr.
18)	
v.)	<u>MOTION AND ORDER TO</u>
19)	<u>EXTEND DEADLINE FOR PLAINTIFF</u>
20 PHWLV, LLC, a Nevada limited liability)	<u>TO RESPOND TO MOTION TO DISMISS</u>
company; and OPBIZ, LLC, a Nevada limited)	<u>PLAINTIFF’S COMPLAINT PURSUANT</u>
21 liability company,)	<u>TO FED. R. CIV. P. 12(b)(1) AND 12(b)(6)</u>
22)	
Defendants.)	(First Request)

23 Plaintiff, Aladdin’s Eatery Systems, Inc. (“AES”), by and through counsel, hereby
 24 requests a 14-day extension of time to respond to Defendant PHWLV, LLC’s **Motion to Dismiss**
 25 **Plaintiff’s Complaint Pursuant to Fed. R. Civ. R. 12(b)(1) and 12(b)(6)** [*Document #21*],
 26 which was filed on June 8, 2018. This Motion is made and based upon Local Rule LR IA 6-1,
 27 the attached Memorandum, and the pleadings and papers on file.
 28

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 Plaintiff AES respectfully requests this Court grant its **Motion and [Proposed] Order to**
3 **Extend Deadline for Plaintiff to Respond to Motion to Dismiss Plaintiff’s Complaint**
4 **Pursuant to Fed. R. Civ. P.12(b)(1) and 12(b)(6).** This is the Plaintiff’s first motion to extend
5 time. Plaintiff submits this Motion in good faith and not for purposes of delay.
6

7 Defendant PHWLV, LLC has agreed to this request for a 14-day extension.

8 PHWLV, LLC’s Motion presents complex issues regarding jurisdiction and construction
9 of the Declaratory Judgment Act, 28 U.S.C. §§2201 *et seq.* AES requires additional time to fully
10 research the issues, consult with counsel on the underlying facts, and prepare a proper response.
11

12 WHEREFORE, Plaintiff respectfully requests that its deadline to respond to PHWLV,
13 LLC’s **Motion to Dismiss Plaintiff’s Complaint Pursuant to Fed. R. Civ. R. 12(b)(1) and**
14 **12(b)(6)** be extended to July 6, 2018.

15 DATED this 19th day of June, 2018.


EDWARD T. SAADI, LLC

17 By: /s/ Edward T. Saadi

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(Attorney has complied with LR IA 11-2)

25 **IT IS SO ORDERED.**

26 
27 _____
28 United States District Judge
Dated: June 19, 2018

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