

1 stipulate to extend the deadline to respond to plaintiff's Motion for
2 Preliminary Injunction. In support of this request, the parties state as
3 follows:

4 The complaint in this action, ECF No. 4, was filed on March 9,
5 2018, thereafter plaintiff filed a Motion for Preliminary Injunction, ECF No.
6 7, on March 12, 2018. On March 19, 2018, counsel for Defendants contacted
7 counsel for plaintiff and indicated a willingness and desire to settle the
8 stated claims without litigation. Since that time, counsel for the parties have
9 initiated settlement discussions and it appears that a mutually agreeable
10 global resolution of this action may be possible. To that end, the parties
11 stipulate to extend the deadline to respond to the Motion for Preliminary
12 Injunction two weeks (14 days) to allow settlement discussions to continue.
13 In the event that settlement is not reached, Defendants expressly reserve the
14 right to respond to the Complaint in any manner permitted by the Federal
15 Rules of Civil Procedure.

16 The response to the Motion for Preliminary Injunction is
17 currently due March 29, 2018. The reply in support of the motion for
18 preliminary injunction is currently due April 5, 2018. The parties hereby
19 stipulate that the deadline to respond to the Motion for Preliminary
20 Injunction shall be extended to April 12, 2018, and any reply in support of
21 the Motion for Preliminary Injunction shall be due on April 19, 2018. This
22 represents an extension of 14 days, is the first request to extend any deadline
23 in this case, and is made expressly for purposes of settlement.

24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated: March 23, 2018

MORRIS LAW GROUP

By: /s/ Jean-Paul Hendricks
Steve Morris, Bar No. 1543
Jean-Paul Hendricks, Bar No. 10079
411 E. Bonneville Ave., Ste. 360
Las Vegas, Nevada 89101
Telephone: (702) 474-9400
sm@morrislawgroup.com
jph@morrislawgroup.com

LAW OFFICE OF VICTORIA E.
BRIANT
Victoria E. Briant (Pro Hac Vice
forthcoming)
4000 Ponce de Leon Blvd., #470
Coral Gables, FL 33146
Telephone: (305) 421-7200
victoria@briantlaw.com

Attorneys for Plaintiff
Estrella Franchising Corp.

Dated: March 23, 2018

CLINGEN CALLOW & MCCLEAN,
LLC

By: /s/ Kenneth J. Vanko
Kenneth J. Vanko
Illinois Bar No. 6244048
2300 Cabot Drive, Suite 500
Lisle, Illinois 60352
Telephone: (630) 871-2609
vanko@ccmlawyer.com

Attorney for Defendants
American Access Agency of
Nevada, LLC, Don Turner, and
American Access Casualty
Company

ORDER

The parties' stipulation is so ordered.



United States District Court Judge

DATED: March 27, 2018

MORRIS LAW GROUP

411 E. BONNEVILLE AVE., STE. 360 · LAS VEGAS, NEVADA 89101
702/474-9400 · FAX 702/474-9422

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Submitted by:

MORRIS LAW GROUP

By: /s/ Jean-Paul Hendricks
Steve Morris, Bar No. 1543
Jean-Paul Hendricks, Bar No. 10079
411 E. Bonneville Ave., Ste. 360
Las Vegas, Nevada 89101
Telephone: (702) 474-9400
sm@morrislawgroup.com
jph@morrislawgroup.com

Attorneys for Plaintiff
Estrella Franchising Corp.

MORRIS LAW GROUP

411 E. BONNEVILLE AVE., STE. 360 • LAS VEGAS, NEVADA 89101
702/474-9400 • FAX 702/474-9422

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28