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10
11 Attorneys for Plaintiff

12 UNITED STATES DISTRICT COURT
13 DISTRICT OF NEVADA

14
15 ESTRELLA FRANCHISING CORP.,) Case No. 2:18-cv-00433
a Florida corporation,)
16)
17 Plaintiff,) **STIPULATION TO EXTEND**
18 v.) **DEADLINE TO RESPOND TO**
19) **MOTION FOR PRELIMINARY**
20) **INJUNCTION**
21) **(SECOND REQUEST)**
22 AMERICAN ACCESS AGENCY OF)
NEVADA, LLC, a Nevada limited)
23 liability company, its officer DON)
TURNER, an Individual, and)
24 AMERICAN ACCESS CASUALTY)
COMPANY, an Illinois corporation,)
25)
Defendants.)

26 Pursuant to LR IA 6-1, plaintiff Estrella Franchising Corp. and
27 defendants American Access Agency of Nevada, LLC, Don Turner, and
28 American Access Casualty Company (collectively "Defendants") hereby

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. The parties previously agreed to stipulate
9 to extend the deadline to respond to the Motion for Preliminary Injunction
10 which was granted by the Court on March 23, 2018. ECF No. 13. Since that
11 time, counsel for the parties have made significant process towards a
12 mutually agreeable global resolution of this action. At this time, the parties
13 believe they are close to a resolution and need additional time to continue
14 their negotiations. To that end, the parties stipulate to extend the deadline
15 to respond to the Motion for Preliminary Injunction an additional two weeks
16 (14 days) to allow settlement discussions to continue.

17 The response to the Motion for Preliminary Injunction is
18 currently due April 12, 2018. The reply in support of the motion for
19 preliminary injunction is currently due April 19, 2018. The parties hereby
20 stipulate that the deadline to respond to the Motion for Preliminary
21 Injunction shall be extended to April 26, 2018, and any reply in support of
22 the Motion for Preliminary Injunction shall be due on May 3, 2018. This
23 represents an extension of 14 days, is the second request to extend any
24 deadline in this case, and is made expressly for purposes of settlement.

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Dated: April 10, 2018

MORRIS LAW GROUP

By: /s/ Jean-Paul Hendricks
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Dated: April 10, 2018

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Attorney for Defendants
American Access Agency of
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American Access Casualty
Company

ORDER

The parties' stipulation is so ordered.


United States District Court Judge

DATED: April 18, 2018