

MORRIS LAW GROUP

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

1 Steve Morris, Nevada Bar No. 1543
2 Jean-Paul Hendricks, Nevada Bar No. 10079
3 MORRIS LAW GROUP
4 411 E. Bonneville Ave., Ste. 360
5 Las Vegas, Nevada 89101
6 Telephone: (702) 474-9400
7 sm@morrislawgroup.com
8 jph@morrislawgroup.com

9 Victoria E. Briant (Pro Hac Vice forthcoming)
10 LAW OFFICE OF VICTORIA E. BRIANT, P.A.
11 4000 Ponce de Leon Blvd., Ste. 470
12 Coral Gables, Florida 33146
13 Telephone: (305) 421-7200
14 victoria@briantlaw.com

15 Attorneys for Plaintiff

16 UNITED STATES DISTRICT COURT
17 DISTRICT OF NEVADA

18 ESTRELLA FRANCHISING CORP.,)
19 a Florida corporation,)

20 Plaintiff,)

21 v.)

22 AMERICAN ACCESS AGENCY OF)
23 NEVADA, LLC, a Nevada limited)
24 liability company, its officer DON)
25 TURNER, an Individual, and)
26 AMERICAN ACCESS CASUALTY)
27 COMPANY, an Illinois corporation,)

28 Defendants.)

Case No. 2:18-cv-00433

STIPULATION TO EXTEND
DEADLINE TO RESPOND TO
MOTION FOR PRELIMINARY
INJUNCTION

(THIRD REQUEST)

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 have twice previously agreed to
9 stipulate to extend the deadline to respond to the Motion for Preliminary
10 Injunction. The first stipulation was granted by the Court on March 23,
11 2018, ECF No. 13 and the second stipulation was granted by the Court on
12 April 18, 2018, ECF No. 17. As a result, the parties have made substantial
13 progress toward resolving this matter. However, the parties need an
14 additional two weeks to resolve the remaining open issues and document
15 their agreement. To that end, the parties stipulate to extend the deadline to
16 respond to the Motion for Preliminary Injunction an additional two weeks
17 (14 days) to finalize the settlement terms and prepare the settlement
18 agreement.

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 The response to the Motion for Preliminary Injunction is
2 currently due April 26, 2018. The reply in support of the motion for
3 preliminary injunction is currently due May 3, 2018. The parties hereby
4 stipulate that the deadline to respond to the Motion for Preliminary
5 Injunction shall be extended to May 10, 2018, and any reply in support of the
6 Motion for Preliminary Injunction shall be due on May 17, 2018. This
7 represents an extension of 14 days, is the third request to extend any
8 deadline in this case, and is made expressly for purposes of settlement.

9 Dated: April 26, 2018

Dated: April 26, 2018

10 MORRIS LAW GROUP

CLINGEN CALLOW & MCCLEAN,
11 LLC

12 By: /s/ Jean-Paul Hendricks
13 Steve Morris, Bar No. 1543
14 Jean-Paul Hendricks, Bar No. 10079
15 411 E. Bonneville Ave., Ste. 360
16 Las Vegas, Nevada 89101
17 Telephone: (702) 474-9400
sm@morrislawgroup.com
jph@morrislawgroup.com

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

18 LAW OFFICE OF VICTORIA E.
19 BRIEANT
20 Victoria E. Brieant (Pro Hac Vice
21 forthcoming)
22 4000 Ponce de Leon Blvd., #470
23 Coral Gables, FL 33146
24 Telephone: (305) 421-7200
victoria@brieantlaw.com

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

25 Attorneys for Plaintiff
26 Estrella Franchising Corp.

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

ORDER

The parties' stipulation, (ECF No. 18), is so ordered.



United States District Court Judge

DATED: May 4, 2018

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.