within 45 days.

1 2 3 4	MORRIS LAW GROUP Ryan M. Lower, NV Bar No. 9108 Jean-Paul Hendricks, Bar No. 10079 411 E. Bonneville Ave., Ste. 360 Las Vegas, Nevada 89101 Telephone: (702) 474-9400 Facsimile: (702) 474-9422		
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7	MCDERMOTT WILL & EMERY LLP    Charles M. McMahon ( <i>pro hac vice</i> pending) <sup>1</sup>		
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10	cmcmahon@mwe.com		
11	Attorneys for Defendant		
12	Jiangsu Longteng-Pengda Electric Mechanical Co., Ltd.		
13			
14	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA		
15			
16	FNA GROUP, INC.,	) Case No. 2:18-CV-00812-RFB-VCF	
17	Plaintiff,	) )	
18	V.	) ) STIPULATION AND ORDER RE	
19	JIANGSU LONGTENG-PENGDA ELECTRIC MECHANICAL CO.,	EXTENSION TO RESPOND TO COMPLAINT	
20	LTD.		
21	Defendant.	) (First Request)	
22			
23	D (( I ID)	(1/) (0 171 1F 1 1D 1 6	
24	Pursuant to Local Rules 6-1(a), 6-2 and 7-1, and Federal Rule of		
25	Civil Procedure 6(b), Defendant Jiangsu Longteng-Pengda Electric		
26	Mechanical Co., Ltd. and Plaintiff FNA Group, Inc., by and through their		
27	respective counsel of record, hereby stipulate as follows:		

<sup>1</sup> Counsel for defendant, Charles M. McMahon, will comply with LR IA 11-2

## $MORRIS\ LAW\ GROUP$ -11 E. Bonneville Ave., Ste. 360 · Las Vegas, Nevada 89101 702/474-9400 · FAX 702/474-9422

On May 7, 2018 plaintiff filed the complaint in the above-entitled matter. ECF No. 1. Defendant was served on May 8, 2018. Defendant's response to the complaint is currently due on May 29, 2018. Defendant requested, and plaintiff consented to, a 30 day extension, up to and including June 28, 2018, to answer or otherwise move as to plaintiff's complaint.

The extension is necessary because defendant is a foreign company that only recently retained counsel in the United States to represent this in this matter. Defendant's counsel needs additional time become familiar with the facts of this case and formulate a proper response.

/// /// /// /// /// /// /// /// /// /// /// /// /// /// /// ///

within 45 days.

1	This is the first request for an extension of any deadline in this		
2	action and is not made for purposes of delay. The request represents an		
3	extension of at most 30 days from the existing deadline.		
4	Dated this 25th day of May, 2018.		
5	SANTORO WHITMIRE	MORRIS LAW GROUP	
6			
7	By: /s/ Jason D. Smith	By: <u>/s/ Ryan M. Lower</u>	
8	Nicholas J. Santoro, No 532	Ryan M. Lower, No. 9108	
9	Jason D. Smith, No. 9691 10100 W. Charleston Blvd. #250	Jean-Paul Hendricks, No. 10079 411 E. Bonneville Ave., Ste. 360	
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11	HOLLAND & KNIGHT LLP	• , ,	
12	Steven E. Jedlinski ( <i>pro hac vice</i> ) Anthony J. Fuga ( <i>pro hac vice</i> )	LLP	
13	131 S. Dearborn, 30th Fl. Chicago, Illinois 60603	Charles M. McMahon ( <i>pro hac</i> vice pending) <sup>2</sup>	
14	Chicago, minois occos	444 W. Lake Street	
15	Attorneys for Plaintiffs FNA Group, Inc.	Chicago, Illinois 60606 Telephone: (312) 984-7641	
16		Attornous for Defendant	
17		Attorneys for Defendant Jiangsu Longteng-Pengda	
18		Electric Mechanical Co., Ltd.	
19			
20			
21	<u>ORDER</u>		
22	IT IS SO ORDERED.		
23		Contacto	
24		UNITED STATES MAGISTRATE JUDGE	
25	Dated: 6-11-2018		
26	Dated.		
27			
28	<sup>2</sup> Counsel for defendant, Charle	s M. McMahon, will comply with LR IA 11-2	