

Ismail Amin, Esq.
Nevada Bar No. 9343
THE AMIN LAW GROUP, NV., LTD.
3753 Howard Hughes Parkway,
Suite 200
Las Vegas, NV 89169
Tel: 702.990.3583
Fax: 702.441.2488
iamin@talglaw.com

John van Loben Sels (*Pro Hac Vice Pending*)
California Bar No. 201354
jvanlobensels@fishiplaw.com
Robert D. Fish (*Pro Hac Vice Pending*)
California Bar No. 149711
rfish@fishiplaw.com
FISH IP LAW, LLP
2603 Main Street, Suite 1000
Irvine, California 92614
Telephone: (949) 943-8300
Facsimile: (949) 943-8358

*Attorneys for Plaintiff
Bird B. Gone Inc.*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

BIRD B. GONE INC., a California
Corporation,

Plaintiff,

v.

HAIERC INDUSTRY CO., LTD., an alien,

Defendant.

Case No. 2:18-cv-00819-APG-NJK

**STIPULATION [AND ~~PROPOSED~~
ORDER] REGARDING EXTENSION OF
TIME TO FILE RESPONSE TO
COMPLAINT**

(FIRST REQUEST)

COMES NOW, Plaintiff Bird-B-Gone, Inc. (hereinafter “BBG” or “Plaintiff”), by and through its counsel of record, and Defendant Haierc Industry Co., Ltd., (hereinafter referred to as “HIC” or “Defendant”), *pro se*, and, pursuant to LR IA 6-1 and hereby stipulate and agree to the following:

1. Plaintiff filed its Complaint in this matter on May 8, 2018 and a summons was issued to Defendant on the same date.
2. Plaintiff served Defendant Haierc Industry Co., Ltd., by personal service on May 8, 2018, making Defendant's current deadline to respond to Plaintiff's Complaint May 29, 2018.
3. Defendant has requested a fourteen (14) day extension of time to file a response to Plaintiff's Complaint, in order to accommodate the parties' ongoing discussions regarding a potential extrajudicial resolution of this matter, as well as to permit Defendant, an alien, to potentially obtain local counsel, and Plaintiff has agreed to the requested extension.
4. This is the parties' first such request for an extension of time for Defendant to respond to the Complaint.

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1 5. It is therefore stipulated by and the between the parties that Defendant shall have
2 until June 12, 2018, to file a response to Plaintiff's Complaint.
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4 Dated: May 21, 2018

5 /s/ Ismail Amin, Esq.

6 Ismail Amin, Esq.
7 Nevada Bar No. 9343
8 THE AMIN LAW GROUP, NV., LTD.
9 3753 Howard Hughes Parkway, Suite 200
10 Las Vegas, NV 89169
11 Tel: 702.990.3583
12 Fax: 702.441.2488
13 iamin@talglaw.com

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16 jvanlobensels@fishiplaw.com

17 Robert D. Fish (*Pro Hac Vice Pending*)
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19 rfish@fishiplaw.com
20 FISH IP LAW, LLP

21 2603 Main Street, Suite 1000
22 Irvine, California 92614
23 Telephone: (949) 943-8300
24 Facsimile: (949) 943-8358

25 *Attorneys for Plaintiff Bird-B-Gone, Inc.*
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Dated: May 24, 2018

/s/

Haier Chen (General Manager)
Haierc Industry Co., Limited
#104 Road, North Industry Park, Jinghai
County, Tianjin City, P.R. China.
Cell: +86 18602234188
TEL: +86-22-68630570
haier@haierc.com
chenhai233@hotmail.com

Defendant

For and on behalf of
Haierc Industry Co., Limited
海盛实业有限公司

IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE
DATED: May 22, 2018