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 12 *International Payment Advisors Ltd*
 and *Marc Maxwell*

13
 14 **UNITED STATES DISTRICT COURT**
 15 **DISTRICT OF NEVADA**

16 INTERNATIONAL PAYMENT ADVISORS
 LTD., a Nevada limited liability company,

17 Plaintiff,

18 v.

19 PAYSAFE SERVICES (US) LLC, a Delaware
 20 Corporation; and DOES 1-10 inclusive,

21 Defendants.

Case No.: 2:19-cv-203-VCF

STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND DEADLINE TO
FILE JOINT PRETRIAL ORDER

Second Request

22 AND ALL RELATED CLAIMS.
 23

24 Plaintiff/Counter-Defendant International Payment Advisors LTD (“IPA”), Counter-
 25 Defendant Marc Maxwell (“Maxwell”), and Defendant/Counterclaimant Global Merchant Advisors,
 26 LLC, f/k/a Paysafe Services (US) LLC (“Paysafe/GMA”), by and through their respective counsel of
 27 record, stipulate and respectfully request that the Court extend the deadline for the parties to submit
 28 the Joint Pretrial Order by twenty- eight (28) days, extending the deadline from June 2, 2022 to June

1 30, 2022. This is the second request for an extension of this deadline and is requested because, in this
 2 case where there has been more than 2 million pages of documents exchanged and more than 20
 3 depositions taken, the Parties are in the process of spending considerable time reviewing, designating,
 4 and preparing all items required in the Joint Pretrial Order under the Local Rules, and meeting and
 5 conferring on items to be included therein. Apart from the breadth of this effort, two other matters
 6 support this request. First, after the initial extension request, on April 29 Paysafe/GMA filed a motion
 7 pursuant to Fed. R. Civ. Proc. 59 and 60 concerning the Court's April 1 grant of partial summary
 8 judgment. IPA/Maxwell's opposition to that motion is due on or before May 13, 2022. Second,
 9 Paysafe/GMA's trial counsel will be travelling out of the country and unavailable during a portion of
 10 the requested extended period. As such, the parties believe that a shorter extension would not permit
 11 completion of their efforts.

12 In sum, the parties have been diligent in their efforts, and will continue to be so and work
 13 together to create a proposed joint pre-trial order. The parties seek this extension to further that effort
 14 and to meet and confer concerning the information to be included in the Joint Pretrial Order, which
 15 the parties agree will likely be substantial. This request is made in good faith and not for purposes of
 16 delay.

17 Dated this 5th day of May 2022.

Dated this 5th day of May 2022.

18 KRAVITZ, SCHNITZER & JOHNSON,
 19 CHTD.

GREENBERG TRAUIG, LLP

20 */s/ Martin Kravitz*

/s/ Jason Hicks

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ORDER

Based upon the stipulation of the parties, and with good cause appearing, IT IS HEREBY ORDERED that the parties shall submit the Joint Pretrial Order on or before June 30, 2022.

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

Dated this 10th day of May, 2022