

1 Ryan T. Gormley, Esq.
 2 *rgormley@wwhgd.com*
 Nevada Bar No. 13494
 WEINBERG, WHEELER, HUDGINS,
 3 GUNN & DIAL, LLC
 6385 South Rainbow Blvd., Suite 400
 4 Las Vegas, Nevada 89118
 Telephone: (702) 938-3838

5
 6 *Local Counsel for Plaintiff,*
Ernest Bock L.L.C.

John F. Palladino, Esq.
john@hpattorneys.com
 Evan M. Labov, Esq.
evanl@hpattorneys.com
 HANKIN PALLADINO WEINTROB
 BELL & LABOV, P.C.
 30 South New York Avenue
 Atlantic City, NJ 08401
 Telephone: (609) 344-5161

Pro Hac Counsel for Plaintiff,
Ernest Bock L.L.C.

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 8 **UNITED STATES DISTRICT COURT**
 9 **DISTRICT OF NEVADA**

10 ERNEST BOCK, L.L.C.,

11 Plaintiff,

12 vs.

Case No.: 2:19-cv-01065-JAD-EJY

13 PAUL STEELMAN, individually; MARYANN
 STEELMAN, individually; PAUL STEELMAN,
 14 as trustee of the Steelman Asset Protection Trust;
 MARYANN STEELMAN, as trustee of the
 15 Steelman Asset Protection Trust; JIM MAIN, as
 trustee of the Steelman Asset Protection Trust;
 16 STEPHEN STEELMAN; SUZANNE
 17 STEELMAN-TAYLOR; PAUL STEELMAN as
 trustee of the Paul C. Steelman and Maryann T.
 18 Steelman Revocable Living Trust; MARYANN
 STEELMAN, as trustee of the Paul C. Steelman
 19 and Maryann T. Steelman Revocable Living Trust;
 20 PAUL STEELMAN, as the trustee of the Paul
 Steelman Gaming Asset Protection Trust;
 21 KEEPSAKE, INC.; SMMR, LLC; SMMR, LLC,
 22 SERIES A-Z; SSSSS, LLC; SSSSS, LLC, SERIES
 B; CHRISTIANA, LLC; CHRISTIANA, LLC,
 23 SERIES A-Z; COMPETITION INTERACTIVE,
 LLC; PAUL STEELMAN, LTD.; STEELMAN
 24 PARTNERS, LLP; PAUL STEELMAN DESIGN
 GROUP, INC.; SAPT HOLDINGS, LLC, SERIES
 25 B; AARON SQUIRES; and MATTHEW
 26 MAHANEY,

27 Defendants.
 28

**STIPULATION EXTENDING BRIEFING
 SCHEDULE ON MOTION FOR LEAVE
 TO AMEND ANSWER**

(FIRST REQUEST)

WEINBERG WHEELER
 HUDGINS GUNN & DIAL



1 Plaintiff Ernest Bock, L.L.C. (“Bock”), the Steelman Parties¹, the Corporate Defendants²,
 2 and Matthew Mahaney, Esq. (“Mahaney”) by and through their respective undersigned counsel,
 3 hereby stipulate, subject to this Court’s approval, to continue the briefing deadlines relating to the
 4 Steelman Parties’ Motion for Leave to Amend Answer (Doc. 292) for a period of twenty-one (21)
 5 days. The deadlines are currently set as follows: Response deadline of Friday, January 3, 2025,
 6 and a Reply deadline of Friday, January 10, 2025. The parties are requesting deadlines set as
 7 follows: Response Deadline of Friday, January 24, 2025, and a Reply deadline of Friday, January
 8 31, 2025. This is the Parties’ first request to extend these deadlines.

9 The subject Motion was filed by the Steelman Parties on December 20, 2024, in order to
 10 comply with the existing amendment deadline (December 30, 2024) but with the intention of
 11 extending the briefing schedule to not overlap with the holidays. Additionally, the subject Motion
 12 seeks leave to assert counterclaims in this matter for the first time against Bock and non-party
 13 Thomas E. Bock. The Motion raises numerous complex issues interwoven with the lengthy
 14 procedural history of multiple litigations. Among other significant issues are whether the Court
 15 has personal jurisdiction over Thomas E. Bock; whether amendment would be unduly prejudicial
 16 where certain proposed counterclaims have been litigated in New Jersey for nearly ten years;
 17 whether amendment is appropriate where the proposed counterclaims arise from agreements with
 18 New Jersey forum selection clauses that were previously enforced by the proposed
 19 counterclaimants; and whether amendment is appropriate where a New Jersey court previously
 20 denied a similar motion to amend in that matter filed by the current proposed counterclaimants.

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 22 ¹ The “Steeleman Parties” refer to Defendants Paul Steelman, individually; Maryann Steelman,
 23 individually; Paul Steelman, as trustee of the Steelman Asset Protection Trust (“SAPT”); Maryann
 24 Steelman, as trustee of the SAPT; Jim Main, as trustee of the SAPT; Stephen Steelman; Suzanne
 25 Steelman-Taylor; Paul Steelman, as trustee of the Paul C. Steelman and Maryann T. Steelman
 26 Revocable Living Trust (“RLT”); Maryann Steelman, as trustee of the RLT; and Paul Steelman,
 27 as trustee of the Paul Steelman Gaming Asset Protection Trust.

28 ² The “Corporate Defendants” refer to Christiania, LLC; Christiania, LLC, Series A-Z;
 Competition Interactive, LLC; Keepsake, Inc.; Paul Steelman Design Group, Inc.; Paul Steelman,
 Ltd.; SAPT Holdings, LLC, Series B; SMMR, LLC; SMMR, LLC, Series A-Z; SSSSS, LLC;
 SSSSS, LLC, Series, B; and Steelman Partners, LLP. Bock named SMMR, LLC, Series A-Z and
 Christiania, LLC, Series A-Z as defendants and contends that they consist of fifty-two (52)
 separate defendants (i.e., SMMR, LLC, Series A; SMMR, LLC, Series B; etc.). The Corporate
 Defendants disagree. In the interest of brevity, those defendants have been stylized as “Series A-
 Z.”

1 Based on the foregoing, the parties respectfully request that the Court grant the stipulation
2 and approve the deadlines outlined herein.

4 DATED: January 2, 2025.

DATED: January 2, 2025.

5 **HANKIN PALLADINO WEINTROB**
6 **BELL & LABOV, P.C.**

BROWNSTEIN HYATT FARBER
SCHRECK, LLP

7 BY: /s/ Evan M. Labov
8 JOHN F. PALLADINO, ESQ. (*pro hac vice*)
john@hpattorneys.com
9 EVAN M. LABOV, ESQ. (*pro hac vice*)
evanl@hptattorneys.com
10 30 South New York Avenue
11 Atlantic City, NJ 08401
12 *Pro-Hac Counsel for Plaintiff*

BY: /s/ Emily A. Ellis
FRANK M. FLANSBURG III, ESQ., #6974
fflansburg@bhfs.com
EMILY A. ELLIS, ESQ., #11956
eellis@bhfs.com
100 North City Parkway, Suite 1600
Las Vegas, NV 89106-4614
Attorneys for the Steelman Parties

13 DATED: January 2, 2025.

DATED: January 2, 2025.

14 **GREENBERG TRAURIG, LLP**

SOLOMON DWIGGINS FREER &
STEADMAN, LTD.

16 BY: /s/ Joel Edward Tasca
17 JOEL EDWARD TASCA, ESQ.
joel.tasca@gtlaw.com
18 10845 Griffith Peak Drive, Suite 600
Las Vegas, NV 89135
Attorney for Corporate Defendants

BY: /s/ Roberto M. Campos
JEFFREY P. LUSZECK, ESQ.
jluszeck@sdfnvlaw.com
ROBERTO M. CAMPOS, ESQ.
rcampos@sdfnvlaw.com
9060 West Cheyenne Avenue
Las Vegas, NV 89129
Attorney for Matthew Mahaney, Esq.

ORDER

IT IS SO ORDERED on this 2nd day of January, 2025.


UNITED STATES MAGISTRATE JUDGE