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5 **UNITED STATES DISTRICT COURT**  
 6 **DISTRICT OF NEVADA**

7 TSAI-LU SHEN, an individual,  
 8 Plaintiff,  
 9 v.  
 10 MICHELLE LACOUR, an individual; DOES I-  
 11 X, inclusive; and ROE CORPORATIONS I-X,  
 inclusive,  
 12 Defendants.

Case No: 2:19-CV-01564-JAD-VCF  
**STIPULATION AND PROPOSED  
 ORDER TO EXTEND PLAINTIFF  
 TSAI-LU SHEN’S DEADLINE TO  
 FILE ITS RESPONSE TO  
 COUNTERCLAIM  
 (ECF NO. 79 AND ECF NO. 109)**

13 MICHELLE LACOUR,  
 14 Counterclaimant,  
 15 v.  
 16 TSAI-LU SHEN,  
 17 Counterclaim  
 18 Defendant,

**(First Request)**

19 MICHELLE LACOUR,  
 20 Third-Party Plaintiff,  
 21 v.  
 22 JAYSON BAYBUTT and PUBCO  
 REPORTING SOLUTIONS, INC.,  
 23 Third-Party Defendants.  
 24

25 Pursuant to Local Rule 7-1, Plaintiff/Counterclaim Defendant, Tsai-Lu Shen’s,  
 26 (“Shen”), and Defendant/Counterclaimant Michelle LaCour’s (“Defendant” or “LaCour”)  
 27 by and through their counsel of record, hereby stipulate and agree as follows:  
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1           1.       To continue Plaintiff's deadline to file his response to the remaining  
2 Counterclaims, extending extend the deadline from February 16, 2021 to and including  
3 March 16, 2021.

4           2.       Plaintiff expressly reserves all defenses or objections to the lawsuit and the  
5 right to file additional claims.

6           3.       This Stipulation is based upon the fact that all parties are in settlement  
7 discussions and the additional time is necessary for the parties to engage in talks and  
8 attempt to finalize a universal settlement.

9 Respectfully submitted by:

10 Dated: February 12, 2021

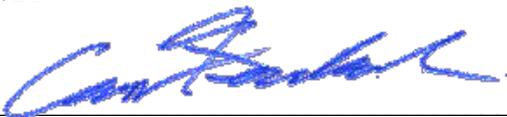
Dated: February 12, 2021

11 /s/ Kimberly P. Stein  
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22 **IT IS SO ORDERED.**

23 Dated this 18th day of February, 2021.

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25   
26 **UNITED STATES MAGISTRATE JUDGE**