

PHILIP J. TRENCHAK, ESQ.

Nevada Bar No. 9924

MULLINS & TRENCHAK, ATTORNEYS AT LAW

1614 S. Maryland Pkwy
Las Vegas, Nevada 89104

Tel: (702) 778-9444

Fax: (702) 778-9449

E-mail: phil@mullinstrenchak.com

Attorneys for Plaintiff/Counter-Defendant

-AND-

JENNY L. FOLEY, Ph.D., ESQ.

Nevada Bar No. 9017

E-mail: jfoley@hkm.com

HKM EMPLOYMENT ATTORNEYS LLP

1785 East Sahara, Suite 300

Las Vegas, Nevada 89104

Tel: (702) 805-8340

Fax: (702) 805-8340

E-mail: jfoley@hkm.com

Attorneys for Plaintiff/Counter-Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

KATELYN WHITTEMORE, an individual,

Plaintiff,

vs.

ANDREW "TOBY" MATHIS, an individual, CLINT COONS, an individual, MICHAEL BOWMAN, an individual, RAYMOND "KENNER" FRENCH, an individual, VAST HOLDINGS GROUP, LLC, doing business as a Nevada limited-liability company; ANDERSON FINANCIAL SERVICES, LLC, doing business as a foreign Washington limited-liability company; VAST SOLUTIONS GROUP, INC., a Nevada Corporation, VAST FINANCIAL SOLUTIONS, INC., a Nevada Domestic Corporation;

CASE NO.: 2:19-cv-01951-GMN-EJY

**STIPULATION AND ORDER TO
REPLY TO DEFENDANTS'/
COUNTERCLAIMANTS' RESPONSE IN
OPPOSITION TO
PLAINTIFF'S/COUNTER-
DEFENDANT'S ANTI-SLAPP SPECIAL
MOTION TO DISMISS PURSUANT TO
NRS 41.637**

(FIRST REQUEST)

1 GRAPHENE ADVISORS LLC, a Nevada
2 Limited Liability Company, VAST
3 SOLUTIONS GROUP, LLC, a
4 Washington Limited Liability Company;
and Anderson Investment Consultants,
LLC; DOES 1-100, inclusive.

5 Defendants.

6
7 VAST HOLDING GROUP, LLC, a
8 Nevada
9 limited liability company, VAST
10 SOLUTIONS GROUP, INC., a Nevada
11 Corporation, GRAPHENE ADVISORS
12 LLC, A Nevada Limited Liability Company,
13 VAST SOLUTIONS GROUP, LLC, A
14 Washington Limited Liability Company,
15 RAYMOND “KENNER” FRENCH, an
16 individual,

17 Counterclaimants,

18 v.

19 KATELYN WHITTEMORE, an individual,
20 and DOES I-X, and ROE
21 CORPORATIONS I-X, inclusive,

22 Counter-Defendants.

23 Plaintiff/Counter-Defendant KATELYN WHITTEMORE (“Plaintiff”) and
24 Defendants/Counterclaimants VAST HOLDINGS GROUP, LLC, VAST SOLUTIONS
25 GROUP, INC., VAST SOLUTIONS GROUP, LLC, VAST FINANCIAL SOLUTIONS, INC.,
26 GRAPHENE ADVISORS, LLC, ANDERSON INVESTMENT CONSULTANTS, LLC AND
27 R. KENNER FRENCH (“Defendants”), by and through their counsel of record, hereby stipulate
28 to extend the deadline for Plaintiff to reply to Defendants’ Response in Opposition to Plaintiff’s
Anti-SLAPP Special Motion to Dismiss pursuant to NRS 41.637 (ECF 99), which was filed on
May 11, 2021. The parties hereby stipulate and agree as follows:

1 1. Plaintiff's reply to Defendants' Response in Opposition to Plaintiff's Anti-SLAPP
2 Special Motion to Dismiss pursuant to NRS 41.637 (ECF 99) is currently due on May 18, 2021.

3 2. In order to avoid unnecessary time and expense in connection with motions to
4 dismiss and other litigation matters pertaining to Defendants' Response in Opposition to Plaintiff's
5 Anti-SLAPP Special Motion to Dismiss pursuant to NRS 41.637 (ECF 99), Plaintiff and
6 Defendants have agreed to extend the time by which Plaintiff shall be required to reply to
7 Defendants' Response in Opposition to Plaintiff's Anti-SLAPP Special Motion to Dismiss
8 pursuant to NRS 41.637 (ECF 99) by a period of two (2) weeks.

9 3. Pursuant to this agreement between the parties, Plaintiff shall be required to file a
10 reply to Defendants' Response in Opposition to Plaintiff's Anti-SLAPP Special Motion to Dismiss
11 pursuant to NRS 41.637 (ECF 99) or before June 8, 2021.

12 4. The parties agree that good cause exists for the request for the extension of the
13 deadline for a reply to Defendants' Response in Opposition to Plaintiff's Anti-SLAPP Special
14 Motion to Dismiss pursuant to NRS 41.637 (ECF 99) for the above-specified reasons.

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