

1 MARK J. CONNOT (10010)
2 REX D. GARNER (9401)
2 **FOX ROTHSCHILD LLP**
3 1980 Festival Plaza Dr., Suite 700
3 Las Vegas, NV 89135
4 Telephone: (702) 262-6899
4 Facsimile: (702) 597-5503
5 mconnot@foxrothschild.com
5 rgarner@foxrothschild.com
5 *Attorneys for Plaintiff Ahern Rentals, Inc.*
6

7

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

10 AHERN RENTALS, INC., a Nevada
11 corporation

12 Plaintiff,
12 v.

13 TEXTRON, INC., a Delaware corporation;
14 TEXTRON SPECIALIZED VEHICLES INC.
14 d/b/a CUSHMAN; E-Z-GO, a division of
15 TEXTRON, INC.; DOES I through X,
15 inclusive; and ROE ENTITIES XI through
XX, inclusive,

16 Defendants.

17 Case No.: 2:20-cv-01638-GMN-DJA

**STIPULATION AND ORDER TO
EXTEND DEADLINES RELATING TO
DEFENDANTS' MOTION TO COMPEL
[ECF 26]**

(FIRST REQUEST)

18 **IT IS HEREBY STIPULATED AND AGREED BY AND BETWEEN** Plaintiff Ahern
19 Rentals, Inc. (“Plaintiff”) and Defendants Textron, Inc.; Textron Specialized Vehicles, Inc. d/b/a
20 Cushman; and E-Z-GO, a division of Textron, Inc. (“Defendants”) (collectively “the Parties”), by
21 and through their respective counsel, to extend the deadline for Plaintiff to respond to Defendants’
22 Motion to Compel Plaintiff’s Computation of Damages and Other Documentation, filed on
23 November 5, 2021 [ECF 26] (the “Motion”), by 14 days from November 19, 2021 to December
24 3, 2021.

25 Further, the Parties have agreed to extend the deadline for Defendants to file their reply
26 to December 17, 2021.

27 //

28 //

1 **NOW, THEREFORE, IT IS STIPULATED AND AGREED** by and between the
2 Parties that the time for Plaintiff to respond to Defendants' Motion to Compel is extended to
3 December 3, 2021, and the deadline for Defendants to file their reply is extended to December
4 17, 2021.

5 **IT IS SO AGREED AND STIPULATED.**

6 Dated: November 17, 2021.

7 **FOX ROTHSCHILD LLP**

9 */s/ Rex D. Garner* _____
10 MARK J. CONNOT (10010)
11 REX D. GARNER (9401)
12 1980 Festival Plaza Drive, Suite 700
13 Las Vegas, Nevada 89135
14 (702) 262-6899 tel
15 (702) 597-5503 fax
16 mconnot@foxrothschild.com
17 rgarner@foxrothschild.com
18 Attorneys for Plaintiff Ahern Rentals, Inc.

6 Dated: November 17, 2021.

7 **WEINBERG, WHEELER, HUDGINS,
8 GUNN & DIAL, LLC**

9 */s/ Daniela LaBounty* _____
10 CAROL P. MICHEL (11420)
11 DANIELA LABOUNTY (13169)
12 6385 South Rainbow Boulevard, Suite 400
13 Las Vegas, NV 89118
14 (702) 938-3838 tel
15 (702) 938-3864 fax
16 cmichel@wwhdg.com
17 dlabounty@wwhdg.com
18 Attorneys for Defendants Textron, Inc.,
19 Textron Specialized Vehicles, Inc., d/b/a
20 Cushman; E-Z-GO, a division of Textron,
21 Inc.

18 **IT IS SO ORDERED.**

19 DATED: November 18, 2021.



20 _____
21 DANIEL J. ALBRECHTS
22 UNITED STATES MAGISTRATE JUDGE
23
24
25
26
27
28