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16 **UNITED STATES DISTRICT COURT**

17 **FOR THE DISTRICT OF NEVADA**

18 MARIA TSATAS, an individual; LEONIDAS
19 VALKANAS, as trustee of the KEET TRUST
dated August 1, 2015; RAYMOND BARAZ,
20 an individual; PASCAL ABDALLAH, an
individual; JIMMY TSOUTSOURAS, an
21 individual; FOTINI VENETIS, an individual;
NICHOLAS TSOUTSOURAS, an individual;
22 CONNIE TSOUTSOURAS, an individual;
RAYMONDE KANHA, an individual;
23 ALFRED BEKHIT, an individual; JACQUEZ
ELBAZ, an individual; MARTINE
24 BENEZRA, an individual; JAMES P.
CARROLL, an individual; DAVID CHIN, an
25 individual; JENNIFER MILLS, an individual;
PAUL SUBLETT, an individual; ANDREW
26 SUBLETT, an individual; MANOLIS
KOSTAKIS, an individual; ESTHER
27 GEORGAKOPOULOS, an individual;
EVAGELIA KOSTAKIS, an individual;
28 DENIS PARSONS, an individual; SOFIA
KARDARAS, an individual; JIMMY
ASMAKLIS, an individual; CORRADINO

CASE NO.: 2:20-cv-2045-RFB-BNW

**STIPULATION TO EXTEND TIME TO
FILE RESPONSES AND REPLY BRIEFS
TO DEFENDANTS' MOTION FOR CASE
DISPOSITIVE SANCTIONS (ECF NO. 242)
BY 7 DAYS**

(Second Request)

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GALUPPO, an individual; DENIS KOPITAS,
an individual; TERRY TSATAS, an
individual; GEORGE TSATAS, an individual;
PANAGIOTA TSATAS, an individual;
OURANIA TSATAS, an individual;
KIRIAKOS PRIMBAS, an individual;
EVANTHIA PRIMBAS, an individual;
PATRICK AYOUB, an individual; MICHAEL
BESCEC, an individual; ERNEST LEBOEUF,
an individual; PHILIPPE LEGAULT, an
individual; EFTIHIOS LITSAKIS, an
individual; GIOVANNI MONCADA, an
individual; MARC RIEL, an individual;
JARADEH SALIM, an individual; HANI
HAMAM, an individual; CONSTANTIN
ZISSIS, an individual; BESSIE PEPPAS, an
individual; NIKI PALIOVRAKAS, an
individual,

Plaintiffs,

v.

AIRBORNE WIRELESS NETWORK, INC., a
Nevada Corporation; MICHAEL J. WARREN,
an individual; J. EDWARD DANIELS, an
individual; MARIUS DE MOS, an individual;
JASON DE MOS, an individual; ROBERT
BRUCE HARRIS, an individual; KELLY
KABILAFKAS, an individual; and
APCENTIVE, INC., a Nevada Corporation,

Defendants.

1 **STIPULATED REQUEST FOR *SECOND* EXTENSION OF DEADLINE TO FILE**
2 **RESPONSE AND REPLY BRIEFS TO ECF NO. 242**

3 Plaintiffs (as listed in the above caption, with the exception of the ten named plaintiffs for
4 whom the Court granted a Motion to Withdraw (ECF No. 219) and for which there is a pending
5 unopposed request to dismiss them (ECF No. 236)) and Defendants (as listed in the above caption,
6 with the exception of the deceased defendant Marius de Mos) (together, the “Parties”), by and
7 through their undersigned counsel of record, submit this Stipulation to Extend Time to File
8 Responses and Replies pursuant to LR IA 6-1, LR IA 6-2, and LR 7-1.

9 WHEREAS, on March 7, 2024, Defendants filed a Motion for Case Dispositive Sanctions
10 for Perjury and Other Misconduct Against All Plaintiffs, or in the Alternative Against Plaintiff
11 Leonidas Valkanas, as Trustee of the Keet Trust (ECF No. 242).

12 WHEREAS, the Parties met and conferred about material that was filed in the Declaration
13 of Peter L. Chasey, Esq. (ECF No. 242-1) that Plaintiffs designated as “CONFIDENTIAL”
14 pursuant to the August 9, 2021 Stipulated Protective Order and Confidentiality Agreement (ECF
15 No. 64).

16 WHEREAS, on March 14, 2024, the Parties reached a stipulation to strike (ECF No. 245)
17 the Declaration of Peter L. Chasey, Esq. (ECF No. 242-1) and replace it with the Amended
18 Declaration of Peter L. Chasey, Esq. (ECF No. 243-1), filed on March 13, 2024 and which redacted
19 the information Plaintiffs designated as “CONFIDENTIAL.”

20 WHEREAS, the meet and confer process regarding the “CONFIDENTIAL” material took
21 time away from Plaintiffs’ ability to oppose Defendants’ Motion (ECF No. 242) on the merits.

22 WHEREAS, the Parties reached a stipulation to extend Plaintiffs’ response date to
23 Defendants’ Motion by one week (ECF No. 246), which the Court granted on March 18, 2024
24 (ECF No. 248).

25 WHEREAS, the Parties agreed that Plaintiffs could have an additional week to respond to
26 Defendants’ Motion, without prejudice to requesting an additional week, if needed. ECF No. 246
27 at p. 3. Plaintiffs’ counsel disclosed to Defendants’ counsel that he had a case set for trial on April
28 3, 2024, and Defendants’ counsel had no objection, as a professional courtesy, to an additional

1 extension, if needed.

2 WHEREAS, Plaintiffs' counsel needs an additional week to respond to Defendants'
3 Motion because of significant pre-trial responsibilities in another matter set for trial on April 3,
4 2024 (including the preparation of pre-trial filings due on March 22, 2024 and opposing two ex
5 parte applications on March 20, 2024, which were heard on March 21, 2024).

6 WHEREAS, this is the Parties' second request for an extension of the deadlines to file a
7 Response and Reply Brief to Defendants' Motion (ECF No. 242).

8 THEREFORE, IT IS HEREBY STIPULATED AND AGREED between the Parties, by
9 and through their respective attorneys of record, that, for good cause, the deadlines to file a
10 Response and Reply Brief to Defendants' Motion (ECF No. 242) is extended by one week as
11 follows (with one additional day for the reply brief as an agreed-upon professional courtesy):

12 Current deadline to file Response to 13 Defendants' Motion for Case Dispositive 14 Sanctions (ECF No. 242)	March 28, 2024
15 New deadline to file Response to 16 Defendants' Motion for Case Dispositive 17 Sanctions (ECF No. 242)	April 4, 2024
18 Current deadline to file Replies re Defendants' 19 Motion for Case Dispositive Sanctions (ECF 20 No. 242)	April 4, 2024
21 New deadline to file Replies re Defendants' 22 Motion for Case Dispositive Sanctions (ECF 23 No. 242)	April 12, 2024

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25 **IT IS SO STIPULATED.**

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27 DATED: March 25, 2024

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Respectfully submitted.

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By: /s/ Andrew B. Goodman
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Attorneys for Plaintiffs

DATED: March 25, 2024

Respectfully submitted.

CHASEY LAW OFFICES
LAW OFFICES OF S. DON BENNION

By: /s/ Peter Chasey
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6980 O'Bannon Drive, Suite 400
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Attorneys for Defendants

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: 3/26/2024

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CERTIFICATE OF SERVICE

I, Amanda McGill, declare that I am employed by the law firm of Novian & Novian, LLP, a citizen of the United States of America, a resident of the state of California, over the age of eighteen (18) years, not a party to the above-entitled action, and competent to be a witness herein.

On March 25, 2024, I caused a true and correct copy of the foregoing document to be served on the person(s) listed below in the manner indicated:

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Marius de Mos
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- Via Hand Delivery
 Via First Class Mail
 Via Facsimile
 Via Electronic Mail
 Via CM/ECF

DATED March 25, 2024.

/s/ Amanda McGill

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