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8 *Attorneys and Local Counsel for Plaintiffs*

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16 *Attorneys for Plaintiffs*

17 **UNITED STATES DISTRICT COURT**
18 **FOR THE DISTRICT OF NEVADA**

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

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

**STIPULATION TO EXTEND TIME TO
FILE OPPOSITIONS AND REPLY BRIEFS
TO MOTIONS TO COMPEL (ECF NOS. 66,
67, 68, 69, 70, 71, 72, 73)**

(First Request)

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DENIS PARSONS, an individual; SOFIA KARDARAS, an individual; JIMMY ASMAKLIS, an individual; CORRADINO 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; EFTIHOS 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 **STIPULATION TO EXTEND TIME TO FILE OPPOSITIONS AND REPLIES**

2 Plaintiffs (as listed in the above caption) and Defendants (as listed in the above caption)
3 (together, the “Parties”), by and through their undersigned counsel of record, submit this
4 Stipulation to Extend Time to File Oppositions and Replies pursuant to LR IA 6-1, LR IA 6-2, and
5 LR 7-1.

6 WHEREAS, on August 27, 2021, Plaintiffs filed eight (8) Motions to Compel (ECF Nos.
7 66, 67, 68, 69, 70, 71, 72, 73), and on August 31, 2021, the Court set hearing dates on the Motions
8 to Compel as follows (ECF No. 75):

- 9 • October 26, 2021 at 10:00 a.m. (ECF Nos. 66, 67, 68).
10 • October 28, 2021 at 10:00 a.m. (ECF Nos. 69, 70, 71).
11 • November 3, 2021 at 10:00 a.m. (ECF Nos. 72, 73).

12 WHEREAS, Defendants’ Oppositions to the Motions to Compel are currently due on
13 September 10, 2021 and Plaintiffs’ Replies are currently due on September 17, 2021;

14 WHEREAS, at the September 3, 2021 hearing on Defendants’ Motion to Dismiss (ECF
15 No. 39), Rule 11 Motion (ECF No. 50), and Motion to Stay (ECF No. 53), the Court ordered the
16 Parties to further meet and confer regarding the Motions to Compel (ECF Nos. 66, 67, 68, 69, 70,
17 71, 72, 73) in light of its rulings that day (ECF No. 76);

18 WHEREAS, the Parties agree that they need additional time to meaningfully have further
19 meet and confer discussions;

20 WHEREAS, this is the Parties’ first request for an extension of the deadlines to file
21 Oppositions and Replies to the Motions to Compel (ECF Nos. 66, 67, 68, 69, 70, 71, 72, 73);

22 WHEREAS, the Parties can extend the deadlines to file Oppositions and Replies to the
23 Motions to Compel (ECF Nos. 66, 67, 68, 69, 70, 71, 72, 73) by three weeks without moving the
24 hearing dates at this time;

25 THEREFORE, IT IS HEREBY STIPULATED AND AGREED between the Parties, by
26 and through their respective attorneys of record, that, for good cause, the deadlines to file
27 Opposition and Replies to the Motions to Compel (ECF Nos. 66, 67, 68, 69, 70, 71, 72, 73) are
28 extended by three weeks as follows:

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1	Current deadline to file Oppositions to	September 10, 2021
2	Motions to Compel (ECF Nos. 66, 67, 68, 69,	
3	70, 71, 72, 73)	
4	New deadline to file Oppositions to Motions	October 1, 2021
5	to Compel (ECF Nos. 66, 67, 68, 69, 70, 71,	
6	72, 73)	
7	Current deadline to file Replies re Motions to	September 17, 2021
8	Compel (ECF Nos. 66, 67, 68, 69, 70, 71, 72,	
9	73)	
10	New deadline to file Replies re Motions to	October 8, 2021
11	Compel (ECF Nos. 66, 67, 68, 69, 70, 71, 72,	
12	73)	

IT IS SO STIPULATED.

DATED: September 8, 2021

Respectfully submitted.

SHUMWAY VAN
 NOVIAN & NOVIAN, LLP

By: /s/ Andrew B. Goodman

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Los Angeles, CA 90067
Attorneys for Plaintiffs

DATED: September 8, 2021

Respectfully submitted.

GREENSPOON MARDER LLP
THE MALONEY FIRM, APC

By: /s/ Gregory M. Smith (electronically signed with permission to Andrew B. Goodman)

PHILLIP SILVESTRI, ESQ. #11276
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PATRICK M. MALONEY, ESQ. (California Bar No. 197844)

GREGORY M. SMITH, ESQ. (California Bar No. 259971)

Attorneys for Defendants

IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

DATED: September 9, 2021

CERTIFICATE OF SERVICE

I certify that all counsel of record who are deemed to have consented to electronic service are being served with a true and correct copy of the above document on September 8, 2021, via the Court's CM/ECF system. Any other parties or counsel of record will be served by regular and/or electronic mail.

/s/ Andrew B. Goodman
Andrew B. Goodman

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