

1 CARLETON R. BURCH  
2 Nevada Bar No. 10527  
3 [crb@amclaw.com](mailto:crb@amclaw.com)  
4 JANIECE S. MARSHALL  
5 Nevada Bar No. 4686  
6 [jm@amclaw.com](mailto:jm@amclaw.com)  
7 ANDERSON, McPHARLIN & CONNERS LLP  
8 601 S. Seventh Street  
9 Las Vegas, Nevada 89101  
10 TELEPHONE: (702) 479-1010 ♦ FACSIMILE: (702) 479-1025  
11 Attorneys for Defendant Illinois National  
12 Insurance Company

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 EB HOLDINGS II, INC. and QXH II, INC.,  
16 Plaintiffs,

17 vs.  
18 ILLINOIS NATIONAL INSURANCE  
19 COMPANY; CONTINENTAL CASUALTY  
20 COMPANY and FEDERAL INSURANCE  
21 COMPANY,  
22 Defendants.

23 Case No. 2:20-cv-02248-JCM-NJK

24 **STIPULATION TO EXTEND TIME FOR  
25 DEFENDANT ILLINOIS NATIONAL  
26 INSURANCE COMPANY TO ANSWER  
27 COMPLAINT  
28 (FIRST REQUEST)**

29 Pursuant to LR-6-1, 6-2 and 7-1 Defendant ILLINOIS NATIONAL INSURANCE  
30 COMPANY (“Illinois National”), by and through its counsel Carleton R. Burch of the law firm of  
31 Anderson McPharlin & Conners LLP and Plaintiffs EB HOLDINGS II, INC., by and through its  
32 counsel Talitha Gray Kozlowski of the law firm of Garman Turner Gordon LLP and QXH II, INC.,  
33 by and through its counsel Paul C. Fuener of the law firm K&L Gates LLP, have agreed to extend  
34 the time for Defendant Illinois National to respond to Plaintiffs’ Complaint to January 15, 2021.<sup>1</sup>

35 This request is for good cause and not for undue delay given:

36  
37 <sup>1</sup>The parties submitted a prior stipulation to extend the time; however, this Court denied the  
38 extension, without prejudice, as the prior stipulation did not comport with LR IA 6-1 as it failed to  
39 give a reason for the requested extension.

1. Plaintiffs Eb Holdings and QXH II filed their Complaint on or about December 11,  
 2 2020.

3. Defendant Illinois National Insurance Company's answer to the Complaint is  
 4 currently due on or before January 6, 2021.

5. Defendant Illinois National Insurance Company seeks an extension to answer the  
 6 Complaint from January 6, 2021 to January 15, 2021.

7. Defendant Illinois National Insurance Company requires additional time to adequately  
 8 prepare the answer to the Complaint as a result of:

9. (a) Pre-existing professional commitments of its counsel in other matters  
 10 including, but not limited, to preparing the Respondent's Brief in *Pound for Pound Promotions, Inc.*  
 11 *v. Golden Boy Promotions, Inc.*, Case A-16-73956, before the Nevada Supreme Court filed on  
 12 January 4, 2021;

13. (b) Delays resulting from COVID-19 pandemic due to the closing of the legal  
 14 offices in both California and Nevada as well as client representatives working remotely and in  
 15 different time zones; and

16. (c) The recent state and federal holidays which has shortened working days to  
 17 prepare answers in conjunction with the already scheduled vacation time of counsel around the  
 18 holidays.

19. / / /

20. / / /

21. / / /

22. / / /

23. / / /

24. / / /

25. / / /

26. / / /

27. / / /

28. / / /

1 5. There have been no other extensions of time to answer the Complaint in this matter.

2 **IT IS SO STIPULATED:**

3 Dated this 5<sup>th</sup> day of January 2021.

4 **GARMAN TURNER GORDON LLP**

5 */s/Talitha Gray Kozlowski*  
6 GREGORY E. GARMAN, ESQ.  
7 TALITHA GRAY KOZLOWSKI, ESQ.  
8 TERESA M. PILATOWICZ, ESQ.  
9 7251 Amigo Street, Suite 210  
10 Las Vegas, Nevada 89119  
11 Attorneys for EB Holdings II, Inc.

**K&L GATES LLP**

5 */s/ Paul C. Fuener*  
6 THOMAS E. BIRSCIC, ESQ.  
7 PAUL C. FUENER, ESQ.  
8 K&L Gates Center  
9 210 Sixth Avenue  
10 Pittsburgh, Pennsylvania 15222

11 GHANDI DEETER BLACKHAM  
12 SHARA L. LARSON, ESQ.  
13 725 S. 8<sup>th</sup> Street, Suite 100  
14 Las Vegas, Nevada 89101  
15 Attorneys for QXH II, Inc.

16 **ANDERSON, McPHARLIN & CONNERS LLP**

17 */s/ Carleton Burch*  
18 CARLETON R. BURCH, ESQ.  
19 JANIECE S. MARSHALL, ESQ.  
20 601 S. Seventh Street  
21 Las Vegas, Nevada 89101  
22 Attorneys for Illinois National Insurance  
23 Company

24 **ORDER**

25 IT IS SO ORDERED.

26 Dated: January 7, 2021

27   
28 United States Magistrate Judge