

ANDERSON, McPHARLIN & CONNERS LLP

LAWYERS

601 S. SEVENTH STREET  
LAS VEGAS, NEVADA 89101  
TEL (702) 479-1010 • FAX (702) 479-1025

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

8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA

11	EB HOLDINGS II, INC. and QXH II, INC.,	Case No. 2:20-cv-02248-JCM-NJK
12	Plaintiffs,	
13	vs.	
14	ILLINOIS NATIONAL INSURANCE	STIPULATION TO EXTEND TIME FOR
15	COMPANY; CONTINENTAL CASUALTY	DEFENDANT ILLINOIS NATIONAL
16	COMPANY and FEDERAL INSURANCE	INSURANCE COMPANY TO ANSWER
17	Defendants.	COMPLAINT
		(FIRST REQUEST)

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

24 This request is for good cause and not for undue delay given:  
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27 <sup>1</sup>The parties submitted a prior stipulation to extend the time; however, this Court denied the  
28 extension, without prejudice, as the prior stipulation did not comport with LR IA 6-1 as it failed to  
give a reason for the requested extension.

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

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

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

7           4.       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.

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

**IT IS SO STIPULATED:**

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

**GARMAN TURNER GORDON LLP**

**K&L GATES LLP**

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

/s/ Paul C. Fuener  
THOMAS E. BIRSIC, ESQ.  
PAUL C. FUENER, ESQ.  
K&L Gates Center  
210 Sixth Avenue  
Pittsburgh, Pennsylvania 15222

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

**ANDERSON, McPHARLIN & CONNERS LLP**

/s/ Carleton Burch  
CARLETON R. BURCH, ESQ.  
JANIECE S. MARSHALL, ESQ.  
601 S. Seventh Street  
Las Vegas, Nevada 89101  
Attorneys for Illinois National Insurance  
Company

**ORDER**

IT IS SO ORDERED.

Dated: January 7, 2021

  
\_\_\_\_\_  
United States Magistrate Judge