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11 *Attorneys for Defendants*
12 *Madsen Holdings, LLC and Brittany Madsen*

13 ADVANTA-STAR AUTOMOTIVE
14 RESEARCH CORPORATION OF
15 AMERICA,

16 Plaintiff,
17 vs.

18 MADSEN HOLDINGS, LLC D/B/A
19 MADSEN MARKETING & PR; TIGER
20 MOTORS LV, INC. D/B/A INFINITI OF
21 LAS VEGAS; AND INFINITI AND
22 BEYOND, LLC D/B/A INFINITY OF
23 KENTUCKY; and BRITTANY MADSEN,
24 an individual,

25 Defendants.

26 Case No. 2:21-cv-00026-RFB-BNW

27 **STIPULATION AND [PROPOSED]
28 ORDER EXTENDING THE TIME FOR
DEFENDANTS MADSEN HOLDINGS,
LLC AND BRITTANY MADSEN TO
FILE AND SERVE THEIR ANSWER OR
OTHER RESPONSE TO THE
COMPLAINT**

(FIRST REQUEST FOR EXTENSION)

29 Pursuant to LR IA 6-1 and 6-2, Plaintiff Advanta-Star Automotive Research Corporation
30 of America (“Plaintiff”) and Defendants Madsen Holdings, LLC (“Madsen Holdings”) and
31 Brittany Madsen (“Ms. Madsen”) state the following:

32 1. The Complaint was filed on January 6, 2021 and the Court issued Summons for
33 Madsen Holding and Ms. Madsen on January 7, 2021.

34 2. Ms. Madsen was served with a copy of the Summons and Complaint on February
35 7, 2021. Madsen Holdings has yet to be served with a copy of the Summons and Complaint.

36 3. Because Madsen Holdings and Ms. Madsen have only recently retained counsel
37 and require time to investigate the Complaint’s allegations, and to eliminate the need to separately

1 serve Madsen Holdings, Plaintiff, Madsen Holdings, and Ms. Madsen, hereby agree and stipulate
2 that: (a) Madsen Holdings accepts service of the Summons and Complaint as of February 7, 2021;
3 and (b) Ms. Madsen and Madsen Holdings shall each have until March 5, 2021 to file and serve
4 their respective answers or other responses to the Complaint.

5 This is the Parties first request for an extension of time for Ms. Madsen and Madsen
6 Holdings to file a responsive pleading to the Complaint.

7 Dated: this 9th day of February 2021

8 **IT IS SO AGREED AND STIPULATED:**

9 HOWARD & HOWARD ATTORNEYS PLLC HOLLY DRIGGS

10 By: /s/ Jonathan W. Fountain
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20 *Attorneys for Plaintiff Advanta-Star*
21 *Automotive Research Corporation of*
22 *America*

23 **IT IS SO ORDERED:**

24 
25 UNITED STATES MAGISTRATE JUDGE

26 DATED: 2/16/2021

27 4835-9029-2184, v. 1

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