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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

17 FREYSSINET, INC., a Virginia corporation,
18 Plaintiff,
19 v.
20 BESSO INSURANCE GROUP LTD., a
21 United Kingdom company, and CERTAIN
22 UNDERWRITERS AT LLOYD'S, LONDON
23 SUBSCRIBING TO BESSO POLICY
24 NUMBER B0595XN5229017, APOLLO
LIABILITY CONSORTIUM NUMBER 9984,
including APOLLO SYNDICATE
MANAGEMENT LIMITED, a United Kingdom
company,
25
Defendants.

Case No. 2:21-cv-00418-APG-BNW

**JOINT MOTION FOR EXTENSION
OF TIME TO FILE RESPONSE TO
DEFENDANTS APOLLO LIABILITY
CONSORTIUM NUMBER 9984 AND
APOLLO SYNDICATE
MANAGEMENT LIMITED'S
MOTION TO DISMISS PLAINTIFF'S
COMPLAINT**

1 Plaintiff Freyssinet, Inc. (“Plaintiff”) and Defendants, Apollo Liability Consortium Number
2 9984 and Apollo Syndicate Management Limited (the “Apollo Defendants” and collectively with
3 Plaintiff, the “Parties”), by and through their undersigned counsel, for good cause shown, hereby
4 jointly move and agree to extend Plaintiff’s deadline to file its response to the Apollo Defendants’
5 Motion to Dismiss Plaintiff’s Complaint [ECF No. 15] (the “Motion”) an additional seven (7) days
6 to May 3, 2021, with the following background and for the following reasons:

7 1. Apollo Defendants filed the Motion on April 12, 2021 [ECF No. 15].
8 2. Plaintiff’s response to the Motion is currently due April 26, 2021.
9 3. The Parties have reached an agreement in principle that will obviate the need for
10 further motion practice but need additional time to formalize their agreement.
11 4. On April 26, 2021, the Parties agreed to the extension requested herein.
12 5. This extension request is sought in good faith and is not made for the purpose of
13 delay.

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1 Therefore, the Parties respectfully request an extension for Plaintiff to file a response to the
2 Motion to and including May 3, 2021.

3 Dated: April 26, 2021

4 SNELL & WILMER L.L.P.

5 */s/ Kelly H. Dove*

6 Kelly H. Dove, Esq.
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Dated: April 26, 2021

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22 *Attorneys for Defendants Certain*
23 *Underwriters at Lloyd's, London Subscribing*
24 *to Policy No. B0595XN5229017*

25 **ORDER**

26 **IT IS ORDERED.**

27 DATED: April 27, 2021.

28 
UNITED STATES DISTRICT COURT JUDGE
Case No. 2:21-cv-00418-APG-BNW

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing **JOINT MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO DEFENDANTS APOLLO LIABILITY CONSORTIUM NUMBER 9984 AND APOLLO SYNDICATE MANAGEMENT LIMITED'S MOTION TO DISMISS PLAINTIFF'S COMPLAINT** by method indicated below:

- BY FAX:** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth on this date before 5:00 p.m. pursuant to EDCR Rule 7.26(a). A printed transmission record is attached to the file copy of this document(s).
- BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed as set forth below.
- BY OVERNIGHT MAIL:** by causing document(s) to be picked up by an overnight delivery service company for delivery to the addressee(s) on the next business day.
- BY PERSONAL DELIVERY:** by causing personal delivery by _____, a messenger service with which this firm maintains an account, of the document(s) listed above to the person(s) at the address(es) set forth below.
- BY ELECTRONIC SUBMISSION:** submitted to the above-entitled Court for electronic filing and service upon the Court's Service List for the above-referenced case.
- BY EMAIL:** by emailing a PDF of the document listed above to the email addresses of the individual(s) listed below.

DATED this 26th day of April, 2021.

/s/ *Maricris Williams*

An employee of SNELL & WILMER L.L.P.

4814-7295-7159