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*Attorneys for Plaintiff
Freyssinet, Inc.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

FREYSSINET, INC., a Virginia corporation,

Plaintiff,

v.

BESSO INSURANCE GROUP LTD., a
United Kingdom company, and CERTAIN
UNDERWRITERS AT LLOYD'S, LONDON
SUBSCRIBING TO BESSO POLICY
NUMBER B0595XN5229017, APOLLO
LIABILITY CONSORTIUM NUMBER 9984,
including APOLLO SYNDICATE
MANAGEMENT LIMITED, a United Kingdom
company,

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**

(FIRST REQUEST)

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.

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4 Dated: April 26, 2021

5 SNELL & WILMER L.L.P.

6 /s/ Kelly H. Dove

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16 *Attorneys for Plaintiff*

Freyssinet, Inc.

Dated: April 26, 2021

BAILEY KENNEDY

6 /s/ Stephanie J. Glantz

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17 *Attorneys for Defendants Certain*

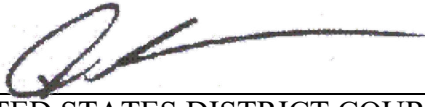
18 *Underwriters at Lloyd's, London Subscribing*

19 *to Policy No. B0595XN5229017*

20 **ORDER**

21 **IT IS ORDERED.**

22 DATED: April 27, 2021.

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25 UNITED STATES DISTRICT COURT JUDGE
26 Case No. 2:21-cv-00418-APG-BNW
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1 **CERTIFICATE OF SERVICE**

2 I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18)
3 years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a
4 true and correct copy of the foregoing **JOINT MOTION FOR EXTENSION OF TIME TO**
5 **FILE RESPONSE TO DEFENDANTS APOLLO LIABILITY CONSORTIUM NUMBER**
6 **9984 AND APOLLO SYNDICATE MANAGEMENT LIMITED'S MOTION TO DISMISS**
7 **PLAINTIFF'S COMPLAINT** by method indicated below:

- 8 ☐ **BY FAX:** by transmitting via facsimile the document(s) listed above to the fax
9 number(s) set forth below 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).
- 10 ☐ **BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with
11 postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed
as set forth below.
- 12 ☐ **BY OVERNIGHT MAIL:** by causing document(s) to be picked up by an overnight
13 delivery service company for delivery to the addressee(s) on the next business day.
- 14 ☐ **BY PERSONAL DELIVERY:** by causing personal delivery by _____, a
15 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.
- 16 ☒ **BY ELECTRONIC SUBMISSION:** submitted to the above-entitled Court for
17 electronic filing and service upon the Court's Service List for the above-referenced case.
- 18 ☐ **BY EMAIL:** by emailing a PDF of the document listed above to the email addresses of
the individual(s) listed below.

19 DATED this 26th day of April, 2021.

20 /s/ Maricris Williams

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

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