

1 KAREN L. HANKS, ESQ.
2 Nevada Bar No. 9578
3 E-mail: karen@hankslg.com
4 HANKS LAW GROUP
5 7625 Dean Martin Drive, Suite 110
6 Las Vegas, Nevada 89139
7 Telephone: (702) 758-8434
8 *Attorneys for Plaintiff Hillcrest Investments, Ltd.*

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

HILLCREST INVESTMENTS, LTD., a
Canadian Corporation; AMERGOSA
ENTERPRISE, LLC.,

Plaintiffs,

vs.

AMERICAN BORATE COMPANY, a foreign
corporation; AMERICAN BORATE
COMPANY of Texas, a foreign corporation;
STATE ENGINEER, STATE OF NEVADA;
DEPARTMENT OF CONSERVATION AND
NATURAL RESOURCES, DIVISION OF
WATER RESOURCES, a Nevada Political
Subdivision; RAMM CORPORATION, a
Nevada Corporation; UNITED STATES FISH
AND WILD SERVICE, a division of the
UNITED STATES; NATIONAL PARK
SERVICE, a division of the UNITED
STATES; DOES I – V; and ROES VI – X,

Defendants.

Case No. 2:21-cv-00964-RFB-NJK

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE
RESPONSE TO
DEFENDANTS' AMERICAN BORATE
COMPANY AND AMERICAN BORATE
COMPANY OF TEXAS' RENEWED
MOTION FOR SANCTIONS**

(ELEVENTH REQUEST)

Plaintiffs, HILLCREST INVESTMENTS, LTD. and AMERGOSA ENTERPRISE, LLC
("Plaintiffs"), Defendants, AMERICAN BORATE COMPANY AND AMERICAN BORATE
COMPANY OF TEXAS (collectively "American Borate") and non-party attorney BYRON
THOMAS, ESQ., ("Thomas") hereby stipulate and agree as follows:

On June 28, 2022, American Borate filed a renewed motion for sanctions against Plaintiffs
and Thomas. Based on the filing of a previous stipulation, Plaintiffs' and Thomas' response is due
November 18, 2022. Hillcrest and American Borate have diligently been negotiating settlement.

1 American Borate needs additional time to consider the Plaintiffs' and Thomas' latest offer. As a
2 result, the parties agree to extend Plaintiffs' and Thomas' response deadline to December 9, 2022.

3 The parties do not seek this extension to cause delay or prejudice any party.

4 Dated this 18th day of November, 2022.

5 **HANKS LAW GROUP**

6 /s/ Karen L. Hanks

7 Karen L. Hanks, Esq.
8 Nevada Bar No. 9578
9 7625 Dean Martin Drive, Ste 110
Las Vegas, Nevada 89139
10 *Attorneys for Plaintiff Hillcrest Investments,
Ltd.*

LEONARD LAW, PC

/s/ Debbie Leonard

Debbie Leonard, Esq.
Nevada Bar No. 8260
955 South Virginia Street, Ste 220
Reno, Nevada 89502
*Attorney for American Borate Company and
American Borate Company of Texas*

11
12 **LAW OFFICES OF BYRON THOMAS**

13
14 /s/ Byron Thomas

15 Byron Thomas, Esq.
Nevada Bar No. 8906
16 3275 S. Jones Blvd. Ste 104
Las Vegas, Nevada 89146
17 *Attorney for Amergosa Enterprise, LLC and
On behalf of himself individually*

18
19
20 **IT IS SO ORDERED.**

21
22 
23 RICHARD F. BOULWARE, II
24 UNITED STATES DISTRICT JUDGE

25
26 DATED this 21st day of November, 2022.
27
28