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**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.

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

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

Dated this 18th day of November, 2022.

**HANKS LAW GROUP**

**LEONARD LAW, PC**

/s/ Karen L. Hanks

/s/ Debbie Leonard

Karen L. Hanks, Esq.

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**LAW OFFICES OF BYRON THOMAS**

/s/ Byron Thomas

Byron Thomas, Esq.

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*Attorney for Amergosa Enterprise, LLC and  
On behalf of himself individually*

**IT IS SO ORDERED.**



**RICHARD F. BOULWARE, II  
UNITED STATES DISTRICT JUDGE**

DATED this 21st day of November, 2022.