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5 Attorneys for Plaintiff, BRIGHTHOUSE LIFE INSURANCE COMPANY, AND
 BRIGHTHOUSE SECURITIES, LLC

7
 8 **UNITED STATES DISTRICT COURT**
 9 **DISTRICT OF NEVADA**

11 BRIGHTHOUSE LIFE INSURANCE
 12 COMPANY; and BRIGHTHOUSE
 SECURITIES, LLC,

13 Plaintiffs,

14 v.

15 GEORGE SCHMIDT, JR.; and
 16 LINCOLN FINANCIAL ADVISORS
 17 CORPORATION,

18 Defendants.

CASE NO.: 2:21-cv-01078-JCM-VCF

19 **STIPULATION AND ORDER FOR**
EXTENSION OF TIME FOR
PLAINTIFFS TO RESPONSE TO
DEFENDANT LINCOLN
FINANCIAL ADVISORS
CORPORATION’S MOTION TO
DISMISS

(Second Request)

21
 22 COMES NOW, the parties, by and through their undersigned counsel,
 23 hereby stipulate and agree that the deadline for Plaintiffs, BrightHouse Life
 24 Insurance Company and BrightHouse securities, LLC (“Plaintiffs”) to respond to
 25 Defendant Lincoln Financial Advisors Corporation’s Motion to Dismiss [Doc. 20]
 26 shall be extended to and including January 28, 2022. This is an additional
 27 extension from the first request for an extension through January 14, 2022
 28 submitted by the parties [Doc. 23] and is requested due to COVID-19 illnesses on

1 the part of Plaintiffs' national counsel and difficulties coordinating with company
2 representatives during the holidays.

3
4 DATED: January 6, 2022

DATED: January 6, 2022

5
6 SKANE MILLS LLP

McDONALD CARANO LLP


7 /s/ Sarai L. Thornton

/s/ Jeff Silvestri

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9 Sarai L. Thornton, Esq. (#11067)
10 1120 Town Center Drive
11 Suite 200
12 Las Vegas, Nevada 89144

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14 Jeff Silvestri, Esq. (#5779)
15 Tara U. Teegarden, Esq. (#15344)
16 2300 W. Sahara Avenue
17 Suite 1200
18 Las Vegas, Nevada 89102

19
20 **IT IS SO ORDERED.**

21
22 
23 UNITED STATES DISTRICT JUDGE

24
25 DATED: January 7, 2022

Yesenia Lutes

From: Jeff Silvestri <jsilvestri@Mcdonaldcarano.com>
Sent: Thursday, January 6, 2022 11:24 AM
To: Yesenia Lutes
Cc: Jeff Silvestri; CaraMia Gerard
Subject: RE: [External Sender] Collins - LFA Motion to Dismiss

Yes. You can sign for me

Jeff Silvestri | Partner

McDONALD CARANO

D: 702.257.4521 | **C:** 702.338.6387
E: jsilvestri@mcdonaldcarano.com

From: Yesenia Lutes <YLutes@SkaneMills.com>
Sent: Thursday, January 6, 2022 11:15 AM
To: Jeff Silvestri <jsilvestri@Mcdonaldcarano.com>
Subject: FW: [External Sender] Collins - LFA Motion to Dismiss

Mr. Silvestri:

Per Ms. Creed's email below, would you please confirm if we have your authorization to insert your e-signature to the attached stipulation?

Thank you.



Yesenia Lopez-Lutes, Paralegal
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On Jan 6, 2022, at 11:47 AM, Aimee Creed <acreed@darcomb.com> wrote:

Hi Paula and Jeff –

Please see attached and let me know whether we may affix your electronic signature before filing.

Thank you again,

Aimee

Aimee L. Creed, Esq.
d'Arcambal, Ousley & Cuyler Burk LLP
Direct dial: (212) 971-3175, ext. 104
Office: (212) 971-3175
Fax: 212-971-3176

From: Aimee Creed <acreed@darcomb.com>
Sent: Wednesday, January 5, 2022 10:12 AM
To: Shaffner, Paula <PShaffner@STRADLEY.COM>; Sparrow, Amy <ASparrow@STRADLEY.COM>
Cc: Doty, David <ddoty@stradley.com>; Jeff Silvestri <jsilvestri@Mcdonaldcarano.com>; Sarai L. Thornton <SThornton@SkaneMills.com>; Patrice Stephenson-Johnson <pjohnson@skanemills.com>; Aimee Creed <acreed@darcomb.com>
Subject: RE: Collins - LFA Motion to Dismiss

Thanks Paula – I appreciate that.

Aimee L. Creed, Esq.
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Fax: 212-971-3176

From: Shaffner, Paula <PShaffner@STRADLEY.COM>
Sent: Wednesday, January 5, 2022 12:44 AM
To: Aimee Creed <acreed@darcomb.com>; Sparrow, Amy <ASparrow@STRADLEY.COM>
Cc: Doty, David <ddoty@stradley.com>; Jeff Silvestri <jsilvestri@Mcdonaldcarano.com>; Sarai L. Thornton <SThornton@SkaneMills.com>; Patrice Stephenson-Johnson <pjohnson@skanemills.com>
Subject: RE: Collins - LFA Motion to Dismiss

Hey Aimee. Happy New Year to you as well. Covid seems to have derailed everything these days. No problem on an additional two week extension. Feel better.

[bio](#) | [vcard](#) | [email](#) | [map](#) | [website](#)

Paula Shaffner
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From: Aimee Creed <acreed@darcomb.com>
Sent: Tuesday, January 4, 2022 12:32 PM
To: Sparrow, Amy <ASparrow@STRADLEY.COM>
Cc: Shaffner, Paula <PShaffner@STRADLEY.COM>; Doty, David <ddoty@stradley.com>; Jeff Silvestri <jsilvestri@Mcdonaldcarano.com>; Sarai L. Thornton <SThornton@SkaneMills.com>; Patrice Stephenson-Johnson <pjohnson@skanemills.com>; Aimee Creed <acreed@darcomb.com>
Subject: RE: Collins - LFA Motion to Dismiss

Hi Jeff and Amy –

Happy New Year – I hope 2022 has been good for you all so far. I just wanted to touch base on our MTD response. You had previously agreed to an extension through January 14 and we submitted that consent motion to the Court. This deadline may still be ok but I wanted to ask whether you would be receptive to another 2-week extension in the event we need it. Unfortunately, I came down with Covid over the holidays and have been kind of knocked down with it. Separately, several colleagues and clients also tested positive so getting certain things done or the necessary people involved has been difficult. It's been pretty challenging in NYC overall these past few weeks.

Thanks,
Aimee

Aimee L. Creed, Esq.
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From: Aimee Creed <acreed@darcomb.com>
Sent: Monday, December 13, 2021 10:23 AM
To: Sparrow, Amy <ASparrow@STRADLEY.COM>
Cc: Shaffner, Paula <PShaffner@STRADLEY.COM>; Doty, David <ddoty@stradley.com>; Jeff Silvestri <jsilvestri@Mcdonaldcarano.com>; Sarai L. Thornton <SThornton@SkaneMills.com>; Patrice Stephenson-Johnson <pjohnson@skanemills.com>; Aimee Creed <acreed@darcomb.com>
Subject: RE: Collins - LFA Motion to Dismiss

Hi Amy –

Please see attached. Subject to final formatting by our Nevada counsel, please let me know whether we may sign on behalf of counsel of record for LFA.

Thanks,
Aimee

Aimee L. Creed, Esq.
d'Arcambal, Ousley & Cuyler Burk LLP
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From: Sparrow, Amy <ASparrow@STRADLEY.COM>
Sent: Friday, December 10, 2021 7:58 AM
To: Aimee Creed <acreed@darcomb.com>
Cc: Shaffner, Paula <PShaffner@STRADLEY.COM>; Doty, David <ddoty@stradley.com>; Jeff Silvestri <jsilvestri@Mcdonaldcarano.com>; Sarai L. Thornton <SThornton@SkaneMills.com>; Patrice Stephenson-Johnson <pjohnson@skanemills.com>
Subject: RE: Collins - LFA Motion to Dismiss

Hi Aimee,

LFA will consent to the one-month extension. Please circulate a draft stipulation for the extension.

Best,
Amy

[bio](#) | [vcard](#) | [email](#) | [map](#) | [website](#)

Amy E. Sparrow
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From: Aimee Creed <acreed@darcomb.com>
Sent: Thursday, December 9, 2021 9:33 AM
To: Sparrow, Amy <ASparrow@STRADLEY.COM>
Cc: Shaffner, Paula <PShaffner@STRADLEY.COM>; Doty, David <ddoty@stradley.com>; Jeff Silvestri <jsilvestri@Mcdonaldcarano.com>; Sarai L. Thornton <SThornton@SkaneMills.com>; Patrice Stephenson-Johnson <pjohnson@skanemills.com>; Aimee Creed <acreed@darcomb.com>
Subject: Collins - LFA Motion to Dismiss

External Email - Think Before You Click

Hi Amy –

We will need to seek a month's extension on our response to LFA's motion to dismiss, getting us past the holidays. I have our response as presently due December 14. Please let me know if you'd consent to an extension through January 14.

Thanks,
Aimee

Aimee L. Creed, Esq.

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