

1 JOSHUA A. SLIKER, ESQ.  
2 Nevada Bar No. 12493  
3 HOLLY E. WALKER, ESQ.  
4 Nevada Bar No. 14295  
5 **JACKSON LEWIS P.C.**  
6 300 S. Fourth Street, Suite 900  
7 Las Vegas, Nevada 89101  
8 Telephone: (702) 921-2460  
9 Facsimile: (702) 921-2461  
10 Email: [joshua.sliker@jacksonlewis.com](mailto:joshua.sliker@jacksonlewis.com)  
11 Email: [holly.walker@jacksonlewis.com](mailto:holly.walker@jacksonlewis.com)

12 *Attorneys for Defendants  
For The Earth Corporation,  
and Nelson Grist*

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 FRANK UNDERHILL, JR., an individual,

16 Plaintiff,

17 vs.

18 FOR THE EARTH CORPORATION, an  
19 Arizona Corporation; NELSON GRIST, an  
20 individual; DOES I through X, inclusive; and  
21 ROE ENTITIES XI through M, inclusive,

22 Defendant.

23 Case No.: 2:21-cv-01287-VCF

24 **STIPULATION TO EXTEND  
25 DEADLINE FOR DEFENDANTS TO  
RESPOND TO PLAINTIFF'S  
COMPLAINT**

26 **(FIRST REQUEST)**

27 IT IS HEREBY STIPULATED by and between Plaintiff Frank Underhill Jr., ("Plaintiff"),  
28 through his counsel EAD Law Group, LLC, and Defendants Integrity Health Corporation f/k/a For  
29 The Earth Corporation and Nelson Grist ("Defendants"), through their counsel Jackson Lewis P.C.,  
30 that Defendants shall have a 14-day extension up to and including Wednesday, July 28, 2021, in  
31 which to file their respective responses to Plaintiff's Complaint. This Stipulation is submitted and  
32 based upon the following:

33 1. Defendants' respective responses to Plaintiff's Complaint are currently due on July  
34 14, 2021.

1           2. Due to defense counsel's recent retention, Defendants require additional time to  
2 investigate Plaintiff's allegations before responding to the Complaint.

3           3. This is the first request for an extension of time for Defendants to file responses to  
4 Plaintiff's Complaint.

5           4. This request is made in good faith and not for the purpose of delay.

6           5. Nothing in this Stipulation, nor the fact of entering into the same, shall have the  
7 effect of or be construed as waiving any claim or defense held by any party hereto.

8           Dated this 14th day of July, 2021.

9           EAD LAW GROUP, LLC

JACKSON LEWIS P.C.

11           */s/ Elaine Dowling*

12           ELAINE DOWLING, ESQ.  
13           Nevada Bar No. 8051  
14           8275 S. Eastern Avenue, Suite 200  
15           Las Vegas, Nevada 89123

16           *Attorney for Plaintiff*  
17           *Frank Underhill, Jr.*

11           */s/ Joshua A. Sliker*

12           JOSHUA A. SLIKER, ESQ.  
13           Nevada Bar No. 12493  
14           300 South Fourth Street, Suite 900  
15           Las Vegas, Nevada 89101

16           *Attorneys for Defendants*  
17           *For The Earth Corporation,*  
18           *and Nelson Grist*

19           **ORDER**

20           IT IS SO ORDERED



21           United States Magistrate Judge

22           Dated: 7-15-2021