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17 *Attorneys for Defendant Alex Oladele*

18
19 **UNITED STATES DISTRICT COURT**
20
21 **DISTRICT OF NEVADA**

22 RESEAU DOCTEUR, INC., a Delaware
23 Corporation,
24 Plaintiff,
25 v.
26 ALEX OLADELE, an individual,
27 Defendant.

28 Case No.: 2:21-cv-01795-GMN-VCF

29 **STIPULATION AND ~~PROPOSED~~
30 ORDER FOR EXTENSION OF TIME FOR
31 DEFENDANT ALEX OLADELE TO
32 ANSWER OR OTHERWISE RESPOND
33 TO COMPLAINT**

34 **(FIRST REQUEST)**

35
36 Defendant Alex Oladele ("Mr. Oladele"), by and through his counsel of record, the law
37 firms of Peterson Baker, PLLC and Walker & Associates LLC, and Plaintiff Réseau Docteur, Inc.,
38 ("RDI"), by and through its counsel of record, the law firm of Greenspoon Marder LLP, hereby
39 stipulate and agree, subject to the Court's approval, as follows:

40 1. RDI filed its Complaint [ECF No. 1] ("Complaint") on September 28, 2021.
41 2. Copies of the Summons and the Complaint were served on Mr. Oladele on October
42 25, 2021. (*See* Affidavit of Service [ECF No. 11].)
43 3. Mr. Oladele's legal counsel were recently retained and require additional time to
44 investigate the allegations in the Complaint and Mr. Oladele's defenses to these allegations.

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1 4. To facilitate his counsel's investigation, and in light of the upcoming Thanksgiving
2 holiday, Mr. Oladele is permitted an additional eighteen (18) days, or until and including December
3 3, 2021, to file and serve his answer or other response to the Complaint.

4 5. If Mr. Oladele files and serves a Fed. R. Civ. P. 12(b) motion on or by December 3,
5 2021, the parties will submit a separate stipulation and proposed order for the Court's review and
6 approval setting forth a briefing schedule for the motion, which will include giving RDI until and
7 including January 20, 2022, to file and serve its response to the motion.

8 6. Mr. Oladele expressly reserves, and does not waive, the right to assert any and all
9 defenses to RDI's Complaint, including, but not limited to, lack of personal jurisdiction.

10 7. This stipulation is not for the purpose of delay and does not prejudice any party.

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1 8. This is the first stipulation for an extension of time to answer or otherwise respond
2 to the Complaint.

3 Respectfully submitted this 16th day of November, 2021.

4 PETERSON BAKER, PLLC

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22 *Attorneys for Plaintiff Réseau Docteur, Inc.*

23 IT IS SO ORDERED.

24 
25 UNITED STATES MAGISTRATE JUDGE

26 Dated: 11-18-2021

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