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Attorneys for Defendant: Precision Valve, Inc.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SOUTHERN DIVISION

MICHAEL OSWELL, an individual,

PLAINTIFF,

VS.

PRECISION VALVE, INC., a Nevada corporation; DOES I through X, and ROE Corporations XI through XX, inclusive,

DEFENDANTS.

Case No.: 2:21-CV-02173-APG-DJA

**STIPULATION AND [PROPOSED] ORDER
FOR LEAVE TO FILE DEFENDANT'S
ANSWER**

Removal Date: December 9, 2021

Trial Date: Non Set

Plaintiff Michael Oswell (hereinafter “Plaintiff”) and Defendant Precision Valve, Inc. (collectively “the Parties”), by and through their attorneys of record, hereby submit the stipulation and [Proposed] Order granting leave to Defendant to file its Answer to Plaintiff’s Complaint.

WHEREAS, Plaintiff filed his Complaint in the Eighth Judicial District Court for Clark County, State of Nevada on September 20, 2021.

1 WHEREAS, Plaintiff served Defendant with the Complaint on November 12, 2021.

2 WHEREAS, Plaintiff filed his First Amended Complaint in the Eighth Judicial District Court for
3 Clark County, State of Nevada on November 22, 2021.

4 WHEREAS, Plaintiff filed proof of service for the First Amended Complaint with a service date
5 of November 23, 2021.

6 WHEREAS, Defendant has no record of being served on that date, but is not contesting service of
7 the First Amended Complaint.

8 WHEREAS, Defendant timely removed this matter to the Instant Court on December 9, 2021.

9 WHEREAS, the Parties respectfully request that the Court refrain from entering an Order of
10 Default against Defendant, and therefore:

11 IT IS HEREBY STIPUALTED AND AGREED, that Defendant shall have until January 7, 2022
12 to file its Answer to the First Amended Complaint.

13 IT IS FURTHER STIPULATED AND AGREED, that Defendant can file its Answer to Plaintiff's
14 First Amended Complaint on or before January 7, 2022.

15 Dated: January 6, 2022

SUTTON HAGUE LAW CORPORATION, P.C.

17 By:


18 S. BRETT SUTTON
19 JARED HAGUE
20 JOSE CARMONA
21 Attorneys for Defendant,
22 *Precision Valve, Inc.*

23 Dated: January 6, 2022

GABROY LAW OFFICES

24 By:


25 /s/ *Kaine Messer*
26 CHRISTIAN GABROY
27 KAINÉ MESSER
28 Attorneys for Plaintiff,
Michael Oswell

ORDER GRANTING DEFENDANT LEAVE TO FILE ITS ANSWER

2 IT IS ORDERED, ADJUDGED AND DECREED, that Defendant shall have until January 7, 2022
3 to file its Answer to the First Amended Complaint.

DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE

DATED: January 7, 2022