

1 **S. BRETT SUTTON**

Nevada Bar No. 12109

2 **JARED HAGUE**

Nevada Bar No. 12761

3 **JOSE CARMONA**

Nevada Bar No. 14494

4 **SUTTON HAGUE LAW CORPORATION, P.C.**

5200 N. Palm Avenue, Suite 203

5 Fresno, California 93704

6 Telephone: (559) 325-0500

Facsimile: (559) 981-1217

7 brett@suttonhague.com

jared@suttonhague.com

8 jose@suttonhague.com

9 Attorneys for Defendant: Precision Valve, Inc.

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 **SOUTHERN DIVISION**

13 * * *

14
15 MICHAEL OSWELL, an individual,

16 PLAINTIFF,

17 vs.

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

21 DEFENDANTS.
22

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

23 Plaintiff Michael Oswell (hereinafter "Plaintiff") and Defendant Precision Valve, Inc.
24 ("Defendant") (collectively "the Parties"), by and through their attorneys of record, hereby submit the
25 following Stipulation and [Proposed] Order granting leave to Defendant to file its Answer to Plaintiff's
26 First Amended Complaint.

27 WHEREAS, Plaintiff filed his Complaint in the Eighth Judicial District Court for Clark County,
28 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.

16
17 By: 

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

21 Dated: January 6, 2022

GABROY LAW OFFICES

22
23
24 By: /s/ Kaine Messer

25 CHRISTIAN GABROY
26 Kaine MESSER
Attorneys for Plaintiff,
Michael Oswell

ORDER GRANTING DEFENDANT LEAVE TO FILE ITS ANSWER

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



DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE

DATED: January 7, 2022
