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11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 **QUANTUM ENERGY, INC.,**

14 **Plaintiff,**

15 **v.**

16 **PCS ADVISORS LLC; and JOHN
 SUPROCK,**

17 **Defendants.**

Case No. 2:21-CV-02184-JAD-BNW

Consolidated with
 Case No. 2:22-CV-00494-JAD-BNW

**STIPULATION AND PROPOSED
 ORDER TO EXTEND DISPOSITIVE
 MOTION AND PRE-TRIAL ORDER
 DEADLINES**

(THIRD REQUEST)

20 **JOHN L. SUPROCK; LAURIE L.
 21 SUPROCK; RENEWABLE ENERGY
 NOW, LLC; and CONSORTIUM, LLC,**

22 **Consolidated Plaintiffs,**

23 **v.**

24 **QUANTUM ENERGY, INC.,**

25 **Consolidated Defendant.**

26
 27

1 The Parties, Quantum Energy, Inc., John L. Suprock, Laurie L. Suprock, Consortium
2 LLC, and Renewable Energy Now, LLC, by and through their counsel of record, jointly
3 move the Court to continue the remaining deadlines for dispositive motions and the joint
4 pre-trial order by thirty (30) days to permit time for the Court to rule on the motions listed
5 in the Notice of Matters Ripe for Decision (Doc. 66):

- 6 (1) Doc. 48 (the Suprock parties' motion to strike Quantum's expert Brenda
7 Hamilton),
- 8 (2) Doc. 49 (the motion to amend the Suprock parties' complaint), and
- 9 (3) Doc. 50 (the Suprock parties' motion to supplement or withdraw their
summary judgment motion).
- 10 (4) Doc. 54 (Quantum Energy, Inc.'s motion to strike the Suprock parties'
11 expert), and
- 12 (5) Doc. 55 (Quantum Energy, Inc.'s motion to dismiss the Suprock parties'
complaint).

13 (collectively, the "Motions"). The Parties request this extension as the resolution of these
14 various motions will affect the scope and issues in any dispositive motion briefing.

15 Pursuant to LR IA 6-1, this is the Parties' third joint request to continue discovery
16 deadlines in the Scheduling Order. Defendant previously moved to extend the deadline for
17 the close of discovery to January 9, 2023, which extension Magistrate Judge Youchah
18 granted. (22-CV-494 ECF No. 49). Following consolidation, this Court extended the close
19 of discovery to January 31, 2023, and set March 2, 2023 as the deadline for dispositive
20 motions, and April 2, 2023 (or 30 days after the final dispositive motion is rule on,
21 whichever is later) as the deadline for the Proposed Joint Pretrial Order. (Doc. 51).
22 Following this extension, the parties jointly moved the Court for another extension, which
23 was granted by the Court, setting May 1, 2023 as the deadline for dispositive motions, and
24 June 1, 2023 (or 30 days after the final dispositive motion is rule on, whichever is later) as
25 the deadline for the Proposed Joint Pretrial Order. (Doc. 64).

26 It is respectfully submitted that the rulings on the Motions will affect the dispositive
27 motions in this matter and thus, for efficiency's sake, briefing should not occur until the
28 rulings are made. The continuance requested herein is not sought for the purposes of delay

1 and will not result in prejudice to the Parties or the Court. Accordingly, the Parties jointly
2 request that the Court continue all deadlines in accordance with the below schedule:

<u>Deadline</u>	<u>Current Date</u>	<u>Proposed New Date</u>
3 Dispositive Motions	4 May 1, 2023	5 June 2, 2023 (or 30 days 6 after the last ruling on the 7 Motions, whichever is 8 later).
9 Pretrial Order	10 June 1, 2023	11 June 30, 2023 (or 30 days 12 after the final dispositive 13 motion is ruled on, 14 whichever is later).

15 **IT IS SO STIPULATED.**

16 Dated: April 10, 2023

Dated: April 10, 2023

17 **WILEY PETERSEN**

FENNEMORE CRAIG, P.C.

18 By: 

By: /s/ Christopher H. Byrd

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25 Joshua D. Wurtzel
26 (admitted pro hac vice)

By: /s/ David A. Timchak

David A. Timchak, Esq.
(admitted pro hac vice)

27 *Attorneys for the Suprock Parties*

Attorneys for Quantum Energy, Inc.

28 **ORDER**

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: April 12, 2023