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*Designated solely for service pursuant to LR IA 11-1(b)*

*Attorneys for Plaintiff Smart Rain Systems, LLC*

**UNITED STATES DISTRICT COURT  
IN AND FOR THE DISTRICT OF NEVADA**

## SMART RAIN SYSTEMS, LLC,

Plaintiff,

VS.

ROHREN – UND PUMPENWERK BAUER  
GES M.B.H., and BAUER NORTH  
AMERICA, INC.,

## Defendants.

Case No. 2:22-cv-00232-CDS-EJY

**JOINT STIPULATION AND ~~PROPOSED~~  
ORDER TO EXTEND THE DEADLINE  
TO RESPOND TO THE COMPLAINT**

**(SEVENTH REQUEST)**

IT IS HEREBY STIPULATED AND AGREED, by Plaintiff Smart Rain Systems, LLC (“Smart Rain”), and Defendant Bauer North America, Inc. (“Bauer NA”), Defendant Rohren - und Pumpenwerk Bauer Ges.m.b.H. (“Bauer GmbH”) (collectively, “Bauer”), through their respective counsel, that the time for Bauer to respond to the Complaint be extended up to and including March 3, 2023. Bauer’s current deadline to respond to the Complaint is January 20, 2023. Plaintiff’s new counsel in this matter is working to get up to speed with Plaintiff and has

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1 communicated with counsel for Defendants about resolving this matter without the need for  
2 further litigation. The additional time stipulated to herein will allow the parties to continue to  
3 explore a potential early resolution of the claims in this case.

4 The reason for the extension is not for purposes of delay or to cause prejudice to any  
5 party, but to allow the parties to continue to discuss settlement possibilities. This is the parties'  
6 seventh request for such an extension from the Court, having had previous extensions granted on  
7 June 3, 2022 [Docket 17], August 4, 2022 [Docket 19], September 7, 2022 [Docket 21], October  
8 5, 2022 [Docket 25], November 4, 2022 [Docket 29] and December 6, 2022 [Docket 31]. This  
9 request complies with Local Rules IA 6-1, IA 6-2, and 7-1.

10 DATED this 18th day of January, 2023.

11 RAY QUINNEY & NEBEKER P.C.

12 /s/ Z. Ryan Pahnke

13 Z. Ryan Pahnke

14 Nevada Bar No. 9641

15 Attorney for Plaintiff

16 David J. Malley

17 Nevada Bar No. 8171

18 Designated counsel pursuant to LR IA 11-1(b)

EVANS FEARS & SCHUTTER LLP

/s/ Chad R. Fears

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20 Attorneys for Defendants

21 **ORDER**

22 **IT IS SO ORDERED.**

23   
24 Layna J. Zouchal  
25 UNITED STATE MAGISTRATE JUDGE

26 Dated: January 19, 2023