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11 UNITED STATES DISTRICT COURT
 12 DISTRICT OF NEVADA

13 TETSUYA NAKAMURA, an individual,
 14 Plaintiff/Counterclaim
 15 Defendant,
 16 v.
 17 SUNDAY GROUP INCORPORATED,
 18 a Delaware Corporation, *et al.*,
 19 Defendants/Counterclaimants.

Case No.: 2:22-CV-01324-MMD-EJY

**STIPULATION AND [PROPOSED]
 ORDER EXTENDING TIME AND
 REVISING STANDARD BRIEFING
 SCHEDULE ON PLAINTIFF’S
 MOTION TO COMPEL
 (FIRST REQUEST)**

21 Plaintiff Tetsuya Nakamura and Defendants Sunday Group Incorporated, SGI Trust, Toshiaki
 22 (Todd) Mitsuishi and James Pack (collectively, “Defendants”), hereby stipulate as follows:

23 WHEREAS, Plaintiff filed a Motion to Compel Documents Responsive to Discovery Requests
 24 (“Motion to Compel”) (Dkt. No. 99/100) on February 21, 2025.

1 WHEREAS, under Civil LR 7-2(b), Defendants’ Response to Plaintiffs Motion to Compel is
2 currently due by March 7, 2025, and Plaintiff’s Reply in Support of the Motion is currently due by
3 March 14, 2025;

4 WHEREAS, due to the current workloads and other conflicts of counsel for the parties, and in
5 order to provide the parties with the time and opportunity to try to narrow the issues before the Court
6 in relation to the Motion to Compel, the parties have determined they would mutually benefit from a
7 revision of the standard briefing schedule on the Motion to Compel to provide each of side with a one-
8 week extension of time in relation to the Motion to Compel;

9 WHEREAS, in light of the foregoing, Plaintiff does not object to a one-week extension of time
10 for Defendants to respond to the Motion to Compel, and Defendants do not object to a one-week
11 extension of time for Plaintiff to file a Reply in Support of the Motion to Compel;

12 WHEREAS, this is the first stipulation for an extension of time in relation to Plaintiffs’ Motion
13 to Compel;

14 **IT IS ACCORDINGLY STIPULATED**, pursuant to LR IA 6-1 and 6-2, that:

- 15 1. Defendants shall file their opposition to the Motion to Compel by March 14, 2025.
 - 16 2. Plaintiff shall file any reply to the opposition by March 28, 2025.
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1 DATED: March 6, 2025

CLYDE SNOW & SESSIONS, P.C.

2 By: /s/ Aaron D. Lebenta
3 Aaron D. Lebenta (UT Bar # 10180)

4 Attorneys for Defendants
5 SUNDAY GROUP INCORPORATED,
6 SGI TRUST, TOSHIKI (TODD) MITSUISHI
7 AND JAMES PACK

8 DATED: March 6, 2025

FENWICK & WEST LLP

9 By: /s/ Casey O'Neill
10 Casey O'Neill

11 Attorneys for Plaintiff
12 TETSUYA NAKAMURA

13 **ORDER**

14 IT IS SO ORDERED:

15 

16 THE HONORABLE ELAYNA J. YOUCHAH
17 UNITED STATES MAGISTRATE JUDGE

18 DATED: March 7, 2025