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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

INNOVATIV MEDIA GROUP, INC., a
Wyoming corporation,

Plaintiff,

vs.

MICHAEL BEYS; RICHARD DE SILVA;
and FTE NETWORKS, INC., a Nevada
corporation

Defendants.

CASE NO.: 2:22-cv-01362-CDS-VCF

**STIPULATION AND ~~[PROPOSED]~~ ORDER
FOR EXTENSION OF TIME TO RESPOND
TO DEFENDANTS' MOTION TO STAY
DISCOVERY**

(First Request)

**STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO
RESPOND TO DEFENDANTS' MOTION TO STAY DISCOVERY**

Pursuant to Federal Rule of Civil Procedure 6(b) and Local Rules 6-1 and 6-2, Plaintiff Innovativ Media Group, Inc. ("Plaintiff") and Michael Beys, Richard de Silva and FTE Networks, Inc., (collectively referred to as "Defendants") stipulate through their undersigned counsel that Plaintiff's deadline to file a response to Defendants' Motion to Stay Discovery (ECF # 45) be extended to December 12, 2022. Defendants consent to the extension.

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1 It is further agreed that nothing in this stipulation shall be deemed to waive or prejudice
2 any claims or defenses of any party to this action.

3 DATED this 18th day of November, 2022.

4 FENNEMORE CRAIG, P.C.

SNELL & WILMER, LLP

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9 -AND-

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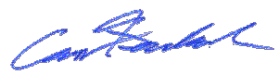
By: /s/ Daniel S. Cereghino
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Attorneys for Defendants Beys and de Silva

15 *Attorneys for Plaintiff*

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19 DATED this 21st day of November, 2022.

20 **IT IS SO ORDERED**

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22 Cam Ferenbach
23 United States Magistrate Judge
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