

1 Bradley S. Slighting, Esq.
 Nevada Bar No. 10225
 2 SLIGHTING LAW
 1707 Village Center Cir, Ste 100
 3 Las Vegas, NV 89134
 4 Tel: (702) 232-2543
 brad@slightinglaw.com

5 Justin L. James, Esq.
 6 *Pro Hac Vice*
 Utah Bar No. 15167
 7 JAMES DODGE RUSSELL & STEPHENS PC
 8 10 W. Broadway, Suite 400
 Salt Lake City, UT 84101
 9 Tel: (801) 363-6363
 jjames@jdrslaw.com

10
 11 *Attorneys for Defendant/Counterclaimant*
 12 *Ivan Tapia and Defendants Angela Cruikshank,*
Jeff Cruikshank, and Justin Owens

13 **UNITED STATES DISTRICT COURT**
 14 **DISTRICT OF NEVADA**

15 INTERNATIONAL MARKETS LIVE INC.,
 a New York corporation dba IM MASTERY
 16 ACADEMY,

Case No.: 2:22-CV-01863-GMN-BNW

17 Plaintiff,

18 v.

**STIPULATION AND [PROPOSED]
 ORDER RE: EXTENSION OF TIME FOR
 FILING OF PAPERS RELATED TO
 PLAINTIFF’S MOTION TO DISMISS
 (ECF NO. 153) (SECOND REQUEST)**

19 DAVID IMONITIE an individual; SPELA
 20 SLUGA, an individual; DEVON ROESER,
 an individual; IVAN TAPIA, an individual;
 21 NVISIONU, INC., a Delaware corporation;
 22 ILYKIT, LLC, a Utah limited liability
 company, LUCAS LONGMIRE, an
 23 individual; NATHAN SAMUEL, an
 individual; MICHAEL ZHOR, an individual;
 24 IMRAN RICHIE, an individual; JUSTIN
 OWENS, an individual; PAULO
 25 CAVALLERI, an individual; JOSE
 MIGUEL CONTREAS, an individual; BASS
 26 GRANT, an individual; ANGELA
 27 CRUISHANK, an individual; JEFF
 CRUISHANK, an individual; VINCE
 28 MURPHY, an individual; GARY
 MCSWEEN, an individual; KATRINA

1 WORGESS, an individual; LUIS
2 RONALDO HARNANDEZ ARRIAGA, an
3 individual; STEPHANIA AYO, an
4 individual; SILVIA AYO, an individual;
5 CATALINA VASQUEZ, an individual;
6 MATHIAS VASQUEZ, an individual;
7 DOES 1 through 10, inclusive; and ROE
8 CORPORATIONS I through X, inclusive,
9
10 Defendants.

11 AND ALL RELATED MATTERS

12 **STIPULATION AND [PROPOSED] ORDER**

13 Defendant/Counterclaimant Ivan Tapia (“Tapia”), Counterdefendant Christopher Terry
14 (“Terry”), (collectively, the “Parties”) by and through their respective undersigned counsel of
15 record, the law firms of Slighting Law, James Dodge Russell & Stephens PC, Kerr Simpson
16 Attorneys at Law, and Holland & Hart LLP, hereby stipulate and agree to: 1) extend the deadline
17 for Tapia to respond to Terry’s Motion to Dismiss (ECF. No. 153; filed 4/18/23); and 2) extend the
18 deadline for Terry to reply to the response filed by Tapia. This is the second stipulation between the
19 Parties to extend the time for Tapia to respond to Terry’s Motion to Dismiss and to extend the time
20 for Terry to reply to Tapia’s response. The Parties hereby specifically agree and stipulate as
21 follows:

22
23 WHEREAS, on April 18, 2023, Terry filed its Motion to Dismiss the Counterclaim filed by
24 Tapia (Motion to Dismiss – ECF No. 153; Counterclaim – ECF No. 44).

25 WHEREAS, on April 25, 2023, counsel for the parties met and conferred via email and
26 agreed to allow Tapia an additional two (2) weeks of time from the current due dates of May 2,
27 2023 to file his response to Terry’s Motion to Dismiss, thereby making such response due May 16,
28 2023.

1 WHEREAS, on April 25, 2023, counsel for the Parties met and conferred via email and
2 agreed to allow Terry an additional two (2) weeks after the filing of Tapia’s response to the Motion
3 to Dismiss for Terry to file his reply, thereby making such reply due May 30, 2023.

4 WHEREAS, on May 16, 2023, counsel for the Parties met and conferred via telephone and
5 agreed to allow Tapia an additional one (1) week of time from the current due date of May 16,
6 2023 to file his response to Terry’s Motion to Dismiss, thereby making such response due May 23,
7 2023.

9 WHEREAS, on May 16, 2023, counsel for the Parties met and conferred via telephone and
10 agreed to allow Terry an additional one (1) week after the filing of Tapia’s response to the Motion
11 to Dismiss for Terry to file his reply, thereby making such reply due June 6, 2023.

12 WHEREAS, no parties oppose the extension of time for the filing of briefing related to the
13 Motion to Dismiss as set forth herein.

14 ///

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 THEREFORE, the Parties jointly stipulate that the Court should enter an order allowing
2 Tapia to file his response to Terry’s Motion to Dismiss by May 23, 2023 and for Terry to file his
3 reply to the response by June 6, 2023.

4 Respectfully submitted, this 16th day of May 2023

5 **SLIGHTING LAW**

6 **WELLMAN AND WARREN LLP**

7 /s/Bradley S. Slighting
8 **Bradley S. Slighting, Esq.**
9 Nevada Bar No. 10225
 1707 Village Center Cir, Ste 100
 Las Vegas, NV 89134

/s/ Chris Wellman
 Chris Wellman, Esq. (Pro Hac Vice)
 California Bar No. 304700
 24411 Ridge Route Dr., Unit 200
 Laguna Hills, CA 92653

10 **JAMES DODGE RUSSELL & STEPHENS PC**

Attorneys for Defendant/Counterclaimant
 Defendant David Imonitie and Defendants
 Spela Shuga, Devon Roeser, NVisionU, Inc.
 Bass Grant, Lucas Longmire, and
 Vince Murphy

11 /s/ Justin L. James
12 **Justin L. James, Esq. (Pro Hac Vice)**
13 Utah Bar No. 15167
14 10 West Broadway, Suite 400
 Salt Lake City, Utah 84101

15 *Attorneys for Defendant/Counterclaimant*
16 *Ivan Tapia and Defendants Angela Cruikshank,*
 Jeff Cruikshank, and Justin Owens

17 **HOLLAND & HART LLP**

THOMPSON BURTON, PLLC

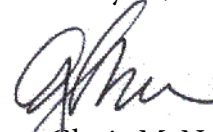
18 /s/ Jenapher Lin
19 **Lars K. Evensen, Esq.**
20 Nevada Bar No. 8061
21 Jenapher Lin, Esq.
22 Nevada Bar No. 14233
 9555 Hillwood Drive, 2nd Floor
 Las Vegas, NV 89134

/s/ Jon E. Field
 Jon E. Field, Esq.
 Nevada Bar No. 7700
 One Franklin Park
 6100 Tower Circle Suite 200
 Franklin, TN 37067

Attorneys for Defendant ILYKIT, LLC

23 P. Sterling Kerr, Esq.
24 Nevada Bar No. 3978
25 George E. Robinson, Esq.
26 Nevada Bar No. 9667
27 **KERR SIMPSON ATTORNEYS AT LAW**
 2900 W. Horizon Ridge Parkway, Suite 200
 Henderson, NV 89052

IT IS SO ORDERED.
Dated: May 17, 2023.



Hon. Gloria M. Navarro
UNITED STATES DISTRICT JUDGE

28 *Attorneys for Plaintiff/Counterdefendant*
 International Markets Live, Inc. and
 Counterdefendant Christopher Terry

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

IT IS SO ORDERED.

Dated: May ____, 2023.

Hon. Magistrate Judge Brenda Weksler
UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 16th day of May, 2023, a true and correct copy of the foregoing **STIPULATION AND [PROPOSED] ORDER RE: EXTENSION OF TIME FOR FILING OF PAPERS RELATED TO PLAINTIFF’S MOTIONS TO DISMISS (ECF NO. 153)** was filed with the Clerk of the Court using the CM/ECF system which automatically sent notification of such filing to and served electronically upon the following counsel:

E-SERVICE LIST

<p>Jon E. Field, Esq. THOMPSON BURTON, PLLC One Franklin Park 6100 Tower Circle Suite 200 Franklin, Tennessee 37067 Tel: (615) 465-6000 Email: jfield@thompsonburton.com</p> <p><i>Attorney for Defendant ILYKIT, LLC</i></p> <p>Bradley S. Slighting, Esq. Nevada Bar No. 10225 SLIGHTING LAW 1707 Village Center Cir., Ste 100 Las Vegas, NV 89134 Tel: (702) 840-3749 Email: brad@slightinglaw.com</p> <p>Chris Wellman, Esq. <i>Pro Hac Vice</i> California Bar No. 304700 WELLMAN AND WARREN LLP 24411 Ridge Route Dr., Unit 200 Laguna Hills, CA 92653 Email: cwellman@w-wlaw.com</p> <p><i>Attorneys for Defendant/Counterclaimant David Imonitie and Defendants Spela Sluga, Devon Roeser, NVisionU, Inc., Bass Grant, Lucas Longmire, and Vince Murphy</i></p>	<p>P. Sterling Kerr, Esq. Nevada Bar No. 3978 George E. Robinson, Esq. Nevada Bar No. 9667 KERR SIMPSON ATTORNEYS AT LAW 2900 W. Horizon Ridge Parkway, Suite 200 Henderson, NV 89052 Tel: (702) 451.2055 sterling@kerrsimpsonlaw.com george@kerrsimpsonlaw.com</p> <p>Lars K. Evensen, Esq. Nevada Bar No. 8061 Jenapher Lin, Esq. Nevada Bar No. 14233 HOLLAND & HART LLP 9555 Hillwood Drive, 2nd Floor Las Vegas, NV 89134 Phone: (702) 669.4600 lkevensen@hollandhart.com jlin@hollandhart.com</p> <p><i>Attorneys for Plaintiff/Counterdefendant International Markets Live, Inc. and Counterdefendant Christopher Terry</i></p> <p><u>/s/ Bradley S. Slighting</u> An employee of Slighting Law</p>
---	--