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 Cross-Claimant Jeremy Hudson*

7 **UNITED STATES DISTRICT COURT**  
 8 **DISTRICT OF NEVADA**

9 STATE FARM MUTUAL AUTOMOBILE  
 INSURANCE COMPANY, an Illinois  
 10 Corporation,

Case No. 2:22-cv-02123-RFB-EJY

11 Plaintiff,

**MOTION FOR EXTENSION OF  
 SCHEDULING ORDER DATES FOR  
 THE LIMITED PURPOSE OF TAKING  
 DEPOSITIONS  
 (First Request)**

12 vs.

13 JEREMY HUDSON, an individual; KOFI  
 THOMAS, an individual; MICHAEL  
 14 SIMON, an individual; PAUL PAULSEN,  
 an individual; AUSTIN WISE, an  
 15 individual; DAVID DANNY SPIVAK, an  
 individual; JAMES BURBANO, an  
 16 individual; WHOLESAL EXOTICS,  
 INC., a Stock Corporation; EXCLUZAYY  
 17 MOTORSPORTS, a California  
 Corporation, THOMAS CLASSICS, an  
 18 Ohio Corporation, DOES I through X,  
 inclusive; and ROE ENTITIES I through X,  
 19 inclusive;

20 Defendants.

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AND ALL RELATED CLAIMS,  
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23 Pursuant to Local Rules IA 6-1, 26-3, and 26-6(c), Defendant JEREMY HUDSON (“Mr.  
 24 Hudson”), by and through his attorney of record, Steven H. Burke, Esq. of the Law Office of  
 25 Steven H. Burke, LLC, hereby moves the Court for an extension of current deadlines set forth in  
 26 the Stipulated Discovery Plan and Scheduling Order. [ECF No. 83].  
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 28

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1 Pursuant to Local Rule 26-6(c), Mr. Hudson has made a good-faith effort to meet and  
2 confer as defined in LR IA 1-3(f) and had a meet-and-confer conference on Monday, July 8,  
3 2024, at 11:00 a.m. PST regarding the extension of discovery further detailed below. *See*,  
4 Declaration of Counsel, Steven H. Burke, Esq. attached as “**Exhibit A**” at ¶3. On July 1, 2024,  
5 counsel for Mr. Hudson sent State Farm Mutual Automobile Insurance Company (“State Farm”),  
6 Mr. Paul Paulsen (“Mr. Paulsen”), and Mr. Austin Wise (“Mr. Wise”) a letter to schedule the  
7 meet-and-confer conference. *Id.* at ¶4. *See also*, Letter to Parties attached as “**Exhibit B.**” State  
8 Farm and Mr. Paulsen appeared for the meet-and-confer conference and agreed to the extension  
9 of discovery pursuant to this request. *See*, Exhibit A at ¶5. *See also*, Email confirming the  
10 agreement of extension attached as “**Exhibit C**”. Mr. Wise failed to appear at the Meet-and-  
11 Confer Conference. *See*, Exhibit A at ¶6. Based on the non-appearance of Mr. Wise at the meet-  
12 and-confer and his non-appearance at his two scheduled depositions noticed by State Farm, it is  
13 clear that Mr. Wise is ignoring and failing to participate in discovery. *See*, Exhibit A at ¶7. Other  
14 than filing a pro-se answer with an address, Mr. Wise has not made any other appearance or  
15 filing or provided the parties with any means of contact other than the address on his Answer. *Id.*  
16 at ¶8.

17 Good cause exists for the extension, on the following grounds: Although several things  
18 have transpired in this case, the pleadings are not yet closed and discovery is not yet fully  
19 complete. Following the dismissal of Defendants James Burbano and Thomas Classics, State  
20 Farm and Mr. Hudson filed a Joint Discovery Plan and Scheduling Order Submitted in  
21 Compliance with LR 26-1(b) on November 15, 2023. State Farm and Mr. Hudson have  
22 exchanged written discovery, but have not been able to complete depositions. During the meet-  
23 and-confer, State Farm and Mr. Paulsen have agreed to this extension, but Mr. Wise has  
24 continued to fail to participate in discovery.

25 Pursuant to Local Rule 26-3, Mr. Hudson provides the following information relative to  
26 the status of discovery and the proposed extension:

- 27 (a) *A statement specifying the discovery completed:* To date, Mr. Hudson and State Farm  
28 have exchanged Initial Disclosures in accordance with Fed. R. Civ. P. 26(a)(1) and this



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(ECF No. 83) be amended to reflect the following deadlines:

1. Close of Discovery Deadline: July 26, 2024 (limited to take depositions of Austin Wise, Paul Paulsen, and Hassan Iddrissu.)
2. Dispositive Motions: August 26, 2024
3. Joint Pretrial Order: September 25, 2024 (Unless dispositive motions are filed, in which case the joint pretrial order shall be filed within 30 days after decision on the dispositive motions or further court order.)

For the reasons set forth above, good cause exists for the granting of this motion. This request is respectfully submitted.

DATED this 8<sup>th</sup> day of July, 2024.

LAW OFFICES OF STEVEN H. BURKE,  
LLC

/s/ Steven H. Burke, Esq.

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*Attorney for Defendant,  
Jeremy Hudson*

**IT IS SO ORDERED.<sup>1</sup>**

DATED this 8th day of July, 2024.

  
U.S. MAGISTRATE JUDGE

<sup>1</sup> The Court notes that Defendant Austin Wise failed to participate in the meet and confer in which all other parties participated.