

1 LEWIS ROCA ROTHGERBER  
 2 CHRISTIE LLP  
 Eric N. Kohli (Bar No. 15763)  
 3 EKohli@LewisRoca.com  
 3993 Howard Hughes Parkway  
 4 Suite 600  
 Las Vegas, NV 89169  
 5 Telephone: (702) 949-8200  
 Facsimile: (702) 949-8398

6 QUINN EMANUEL URQUHART &  
 7 SULLIVAN, LLP  
 Ryan Goldstein (*Pro Hac Vice*)  
 8 ryangoldstein@quinnemanuel.com  
 Daniel C. Posner (*Pro Hac Vice*)  
 9 danposner@quinnemanuel.com  
 865 S. Figueroa Street, 10th Floor  
 10 Los Angeles, CA 90017  
 Telephone: (213) 443-3000

11 Michael LaFond (*Pro Hac Vice*)  
 12 michaellafond@quinnemanuel.com  
 555 Twin Dolphin Drive, 5th Floor  
 13 Redwood City, CA 94065  
 Telephone: (650) 801-5000

14 *Attorneys for Plaintiff*

GREENBERG TRAURIG, LLP  
 Mark G. Tratos (Bar No. 01086)  
 tratosm@gtlaw.com  
 Bethany L. Rabe (Bar No. 11691)  
 10845 Griffith Peak Drive  
 Suite 600  
 Las Vegas, Nevada 89135  
 Telephone: (702) 792-3773  
 Facsimile: (702) 792-9002

FINNEGAN, HENDERSON, FARABOW,  
 GARRETT & DUNNER LLP  
 Jenevieve J. Maerker (*Pro Hac Vice*)  
 jenevieve.maerker@finnegan.com  
 Danny Awdeh (*Pro Hac Vice*)  
 danny.awdeh@finnegan.com  
 Yoonhee Kim (*Pro Hac Vice*)  
 yoonhee.kim@finnegan.com  
 Patrick J. Rodgers (*Pro Hac Vice*)  
 patrick.rodgers@finnegan.com  
 Maxime I. Jarquin (*Pro Hac Vice*)  
 maxime.jarquin@finnegan.com  
 901 New York Avenue NW  
 Washington, DC 20001  
 Telephone: (202) 408-4000  
 Facsimile: (202) 408-4400

*Attorneys for Defendants*

16 **UNITED STATES DISTRICT COURT**  
 17 **DISTRICT OF NEVADA**

18 TEAMLAB INC., a Japanese  
 19 corporation,

20 Plaintiff,

21 vs.

22 ARTE MUSEUM LV, LLC, a Delaware  
 limited liability company, D'STRICT  
 23 HOLDINGS, INC., a Delaware  
 Corporation, and D'STRICT KOREA  
 24 INC., a Korean Corporation,

25 Defendants.

Case No. 2:23-cv-01956-JAD-DJA

**STIPULATION AND ORDER TO  
 MODIFY EXISTING SCHEDULING  
 ORDER**

**[SECOND REQUEST]**

26 Pursuant to LR IA 6-1 and 6-2, and LR 26-3, Plaintiffs and Defendants stipu-  
 27 late, by and through their respective counsel, to request the Court to extend their cur-  
 28 rent discovery deadlines by thirty (30) days.

1 1. On September 23, 2024, the Court granted the parties' first stipulation to extend  
2 the discovery schedule (by 60 days) due largely to the delays associated with having  
3 foreign clients on both sides of the case, and the difficulties of conducting foreign  
4 discovery involving foreign-language documents. The parties had also, at that time,  
5 initiated informal settlement discussions.

6 2. Since then, the parties have been engaged in extensive settlement discussions  
7 and have made substantial progress toward a negotiated resolution of their dispute.

8 3. In parallel, the parties have conducted further discovery activities. To date, the  
9 parties have exchanged responses to interrogatories and requests for production, and  
10 both sides have made multiple document productions on a rolling basis. The parties  
11 continue to search for and review responsive documents and expect to be able to com-  
12 plete their document productions in the near future.

13 4. No depositions have been taken yet. The parties have discussed deposition lo-  
14 gistics and scheduling, but they have held off on scheduling depositions and resolving  
15 remaining document production issues, in order to focus their efforts on the settlement  
16 negotiations. At this point, deposition rooms at the U.S. Consulate in Tokyo, where  
17 some depositions may need to be conducted, are not available until January 6, 2025  
18 or later (*see* <https://jp.usembassy.gov/services/depositions-in-japan/>).

19 5. Despite the parties' diligent efforts and progress, they agree that additional time  
20 will be necessary to complete written discovery and depositions before serving their  
21 respective expert disclosures.

22 6. The parties believe that a 30-day extension of the discovery and disclosure dead-  
23 lines will facilitate their completion of settlement discussions and, as needed, discov-  
24 ery.

25 7. The extension is not sought for any improper purpose or delay. Rather, the par-  
26 ties seek the extension to ensure that settlement discussions can proceed and discovery  
27 can be completed if it proves necessary.

1 In accordance with the parties' stipulated 30-day extension, the current discov-  
2 ery deadlines and the parties' proposed extended deadlines are:

3

Scheduled Event	Current Deadline	Proposed Deadline
4 Expert Disclosure pursuant 5 to Fed. R. Civ. P. 26(a)(2)	December 16, 2024	January 15, 2025
6 Rebuttal Expert Disclosure 7 pursuant to Fed. R. Civ. P. 8 26(a)(2)	January 17, 2025	February 18, 2025
9 Discovery Cut-off	February 14, 2025	March 17, 2025
10 Dispositive Motions	March 17, 2025	April 16, 2025
11 Joint Pretrial Order	April 15, 2025	May 15, 2025

12 This is the parties' second stipulated request for an extension of discovery. The  
13 parties respectfully submit that their reasons set forth above constitute compelling rea-  
14 sons for the requested extension.

15 WHEREFORE, the parties respectfully request that this Court extend the cur-  
16 rent discovery deadlines by thirty (30) days in accordance with the table above.  
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1 DATED this 25<sup>th</sup> of  
2 November, 2024

Eric N. Kohli (Bar No. 15763)  
LEWIS ROCA ROTHGERBER  
CHRISTIE LLP

3  
4 Ryan Goldstein (*Pro Hac Vice*)  
Daniel C. Posner (*Pro Hac Vice*)  
5 Michael LaFond (*Pro Hac Vice*)  
6 QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

7 By: /s/ Eric N. Kohli  
*Attorneys for Plaintiff*

8  
9 DATED this 25<sup>th</sup> of  
10 November, 2024

Mark G. Tratos (Bar No. 01086)  
Bethany L. Rabe (Bar No. 11691)  
GREENBERG TRAUERIG, LLP

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12 Danny Awdeh (*Pro Hac Vice*)  
Yoonhee Kim (*Pro Hac Vice*)  
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Maxime I. Jarquin (*Pro Hac Vice*)  
14 FINNEGAN, HENDERSON, FARABOW,  
GARRETT & DUNNER LLP

15 By: /s/ Bethany L. Rabe  
*Attorneys for Defendants*

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18  
19 **ORDER**

20 IT IS SO ORDERED:

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22 \_\_\_\_\_  
DANIEL J. ALBREGTS  
23 UNITED STATES MAGISTRATE JUDGE

24 DATED: 11/26/2024