

HOWARD & HOWARD ATTORNEYS PLLC

1 W. West Allen, Esq.
 Nevada Bar No. 5566
 2 Jonathan W. Fountain, Esq.
 Nevada Bar No. 10351
 3 HOWARD & HOWARD ATTORNEYS PLLC
 3800 Howard Hughes Parkway, Suite 1000
 4 Las Vegas, Nevada 89169
 Telephone: (702) 257-1483
 5 Email: wwa@h2law.com
 Email: jwf@h2law.com

6 *Attorneys for Plaintiff MJL 12, LLC*

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 MJL 12, LLC, a Nevada limited liability
company,

11 Plaintiff,

12 v.

13 TRIUMPH INTERNATIONAL, LLC, a
California limited liability company,

14 Defendant.

Case No. 2:24-cv-00122-GMN-EJY

**STIPULATION AND [PROPOSED]
 ORDER EXTENDING THE TIME
 FOR PLAINTIFF TO FILE AND SERVE
 ITS RESPONSE TO DEFENDANT’S
 MOTION TO DISMISS**

(First Request)

16 Pursuant to Federal Rule of Civil Procedure 6(b) and LR IA 6-1, the parties, by and
 17 through their undersigned counsel, hereby agree and stipulate to extend the date for Plaintiff MJL
 18 12, LLC to file and serve its response to Defendant Triumph International, LLC’s Special Motion
 19 to Dismiss Plaintiff’s Seventh Claim Pursuant to Nevada Anti-SLAPP Statute; and Motion to
 20 Dismiss Sixth and Seventh Claims Pursuant to Fed. R. Civ. P. 12(b)(6) and Second Claim
 21 Pursuant to Fed. R. Civ. P. 12(b)(1) and 12(b)(6) (ECF No. 13), filed on April 26, 2024
 22 (hereinafter, the “Motion”), and, in support of the same, state the following:

23 1. Plaintiff filed its Complaint for Declaratory and Other Relief on January 17, 2024.
 24 (ECF No. 1.) On February 26, 2024, Plaintiff sent Defendant a request to waive formal service of
 25 the Summons and Complaint. (ECF No. 7.) Defendant executed the waiver on March 11, 2024.
 26 (*Id.*) As a result, Defendant’s answer or other response to the Complaint was due on April 26,
 27 2024. (*Id.*)

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1 2. On April 26, 2024, Defendant filed the Motion seeking to dismiss Plaintiff's
2 seventh claim for relief pursuant to Nevada's Anti-SLAPP statute and seeking to dismiss
3 Plaintiff's sixth and seventh claims pursuant to Rule 12(b)(1) and 12(b)(6) of the Federal Rules of
4 Civil Procedure.

5 3. Plaintiff has requested, and Defendant has agreed, that Plaintiff may have until
6 May 17, 2024 to respond to the Motion in order to accommodate the schedules of Plaintiff's
7 counsel.

8 4. The parties therefore agree to extend the date for Plaintiff to file and serve its
9 response to the Motion from May 10, 2024, to May 17, 2024.

10 5. This is the first request for an extension of time to respond to the Motion.

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6. The parties agree, based on the foregoing, that good cause exists for the requested extension.

IT IS SO AGREED AND STIPULATED:

HOWARD & HOWARD ATTORNEYS PLLC

PISANELLI BICE PLLC

By: /s/ Jonathan W. Fountain
W. West Allen, Esq.
Nevada Bar No. 5566
Jonathan W. Fountain, Esq.
Nevada Bar No. 10351
3800 Howard Hughes Parkway, Ste. 1000
Las Vegas, Nevada 89169
Telephone: (702) 257-1483

By: /s/ Todd L. Bice
Todd L. Bice, Esq.
Nevada Bar No. 4534
Daniel R Brady, Esq.
400 South 7th Street, Suite 300
Las Vegas, Nevada 89101
Telephone: (702) 214-2100

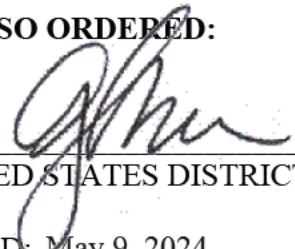
*Attorneys for Plaintiff
MJL 12, LLC*

KINSELLA HOLLEY ISER KUMP
STEINSAPIR LLP
Jonathan Steinsapir, Esq. (Pro Hac Vice)
Gregory P. Korn, Esq. (Pro Hac Vice)
11766 Wilshire Boulevard, Suite 750
Los Angeles, California 90025
Telephone: (310) 566-9800

QUINN EMANUEL URQUHART &
SULLIVAN, LLP
Alex Spiro, Esq. (Pro Hac Vice)
Todd Anten, Esq. (Pro Hac Vice)
51 Madison Ave., 22nd Floor
New York, New York 10010
Telephone: (212) 849-7000

*Attorneys for Defendant
Triumph International, LLC*

IT IS SO ORDERED:



UNITED STATES DISTRICT JUDGE

DATED: May 9, 2024