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 5 *VINTAGE, INC. dba VINTAGE POOLS and*
 6 *SARAH JACKSON*

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

9 PHILADELPHIA INDEMNITY
 10 INSURANCE COMPANY,

11 Plaintiff,

12 vs.

13 VINTAGE, INC. dba VINTAGE POOLS;
 14 SARAH JACKSON; and DOES 1 through
 X, and ROE CORPORATIONS, 1 through
 X, inclusive,

15 Defendants.

CASE NO. 2:24-cv-1828

**STIPULATION AND ORDER TO
 EXTEND DEADLINE FOR
 DEFENDANTS VINTAGE, INC. dba
 VINTAGE POOLS and SARAH
 JACKSON TO FILE RESPONSE TO
 PLAINTIFF’S MOTION FOR
 PRELIMINARY INJUNCTION (ECF #3)
 AND TEMPORARY RESTRAINING
 ORDER (ECF #4)**

(SECOND REQUEST)

18 COME NOW, Defendants VINTAGE, INC. dba VINTAGE POOLS and SARAH
 19 JACKSON(“Defendants”) by and through their counsel of record, John Henry Wright, Esq., of
 20 The Wright Law Group, P.C., and Plaintiff PHILADELPHIA INDEMNITY INSURANCE
 21 COMPANY(“PIIC”) by and through its attorney, Kurt C. Faux, Esq., of The Faux Law Group, and
 22 hereby stipulate and agree as follows:

23 PIIC filed its Complaint (ECF # 1), Motion for Preliminary Injunction (ECF #3) and
 24 Temporary Restraining Order (ECF #4) on September 30, 2024. On October 8, 2024 Defendants
 25 were served with the Summons and Complaint (ECF # 9). On November 26, 2024 the Court
 26 issued a Minute Order (ECF #10) directing the Defendants to file their response to Plaintiff’s
 27 Motion for Preliminary Injunction (ECF #3) and Temporary Restraining Order (ECF #4) by
 28 December 10, 2024.

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1 The parties are currently negotiating and the underlying state lawsuit has been settled
2 pending finalization of the settlement agreement currently with counsel for plaintiff in the
3 underlying state case and Mr. Faux. Defendants have already partially performed under the terms
4 of settlement agreement.

5 Therefore, the parties to the instant case hereby agree and request the Court's consent to
6 extend the current deadline to oppose Plaintiff's Motion for Preliminary Injunction (ECF #3) and
7 Temporary Restraining Order (ECF #4) by thirty days along with a continuation of the deadline set
8 by the Court in its November 26, 2024 Minute Order.

9 **IT IS HEREBY AGREED AND STIPULATED**, that the deadline for Defendants to file
10 a response to Plaintiff's Motion for Preliminary Injunction (ECF #3) and Temporary Restraining
11 Order (ECF #4) shall be extended until January 30, 2025.

12 The parties have entered into the agreement and good faith and not for any improper
13 purpose or delay. This is the parties' second request for an extension.

14
15 Dated this 3rd day of January, 2025.

Dated this 3rd day of January, 2025.

16 **THE FAUX LAW GROUP**

THE WRIGHT LAW GROUP, P.C.

17 */s/ Kurt C. Faux, Esq.*

/s/ John Henry Wright, Esq.

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INDEMNITY INSURANCE COMPANY*

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VINTAGE, INC. dba VINTAGE POOLS and
SARAH JACKSON*

24 **IT IS SO ORDERED.**

25
26 

27 RICHARD F. BOULWARE, II
28 UNITED STATES DISTRICT JUDGE

DATED this 5th of January 2025.