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 12 *PROXAMAMA, INC.*

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 EMULAIT, INC. f/k/a PROXAMAMA, INC.,
 16 Plaintiff,
 17 v.
 18 ROEMBKE TURNKEY SOLUTIONS, LLC,
 ROEMBKE MFG. & DESIGN, INC., and
 19 GREGORY J. ROEMBKE,
 20 Defendants.

Case No. 2:24-CV-02267-APG-NJK

**STIPULATION AND ORDER TO
 EXTEND DEADLINE TO RESPOND
 TO DEFENDANTS’ MOTION TO
 DISMISS OR TO TRANSFER**
(First Request)

22 Pursuant to Local Rules IA 6-1, IA 6-2, and LR 7-1, Plaintiff Emulait, Inc. f/k/a
 23 Proxamama, Inc. (“Plaintiff”) and Defendants Roembke Turnkey Solutions, LLC, Roembke Mfg.
 24 & Design, Inc., and Gregory J. Roembke (“Defendants,” together with Plaintiff, the “Parties”),
 25 respectfully request that the Court approve this Stipulation to Extend the Deadline to Respond to
 26 Defendants’ Motion to Dismiss or to Transfer. This is the Parties’ first request.

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IT IS HEREBY STIPULATED AND AGREED as follows:

1. Defendants filed their Motion to Dismiss or to Transfer [ECF Nos. 16 and 17] (the “Motion”) on January 17, 2025.

2. The current deadline for Plaintiff to file its response to Defendants’ Motion is January 31, 2025.

3. Defendants consent to a two-week extension on Plaintiff’s response deadline, as Defendants had also requested and were granted a two-week extension to file a response to the Complaint, which the Court approved [ECF No. 15].

4. Plaintiff requests the extension to permit sufficient time for Plaintiff and its employees to locate the documentation necessary to support the declaration it intends to file in support of its opposition to Defendants’ Motion to Dismiss or to Transfer.

5. This request is not intended to cause delay or prejudice any party.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the Parties that the time for Plaintiff to respond to Defendants’ Motion to Dismiss or to Transfer be extended to February 11, 2025.

DATED this 28th day of January, 2025.

DATED this 28th day of January, 2025.

FOX ROTHSCHILD LLP

KAEMPFER CROWELL

/s/ Rex D. Garner
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PROXAMAMA, INC.*

*Attorneys for Defendants ROEMBKE
TURNKEY SOLUTIONS, LLC, ROEMBKE
MFG. & DESIGN, INC., and GREGORY J.
ROEMBKE*

IT IS SO ORDERED:

Dated: January 29, 2025



ANDREW P. GORDON
CHIEF UNITED STATES DISTRICT JUDGE