

1 RYAN W. DANIELS  
Nevada Bar No. 13094  
2 KRISTOPHER J. KALKOWSKI  
Nevada Bar No. 14892  
3 KAEMPFER CROWELL  
1980 Festival Plaza Drive, Suite 650  
4 Las Vegas, Nevada 89135  
Telephone: (702) 792-7000  
5 Fax: (702) 796-7181  
[rdaniels@kcnvlaw.com](mailto:rdaniels@kcnvlaw.com)  
6 [kkalkowski@kcnvlaw.com](mailto:kkalkowski@kcnvlaw.com)

7 *Attorneys for Defendants*  
*Jackie Robinson; All Net, LLC;*  
8 *Dribble Dunk, LLC; and Loring Jacobs*

9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 TACSIS APC, a California corporation; and  
12 KENT LIMSON, an individual,

13 Plaintiffs,

14 vs.

15 JACKIE ROBINSON, an individual; et al.

16 Defendants.

Case No.: 2:24-cv-02284-RFB-EJY

**STIPULATION TO EXTEND TIME TO  
FILE REPLIES TO MOTIONS TO  
DISMISS  
[ECF Nos. 35 and 36]**

17 The above-referenced parties hereby agree and stipulate to extend the current deadline of  
18 March 4, 2025 for Defendants Jackie Robinson; All Net, LLC; Dribble Dunk, LLC; Loring Jacobs,  
19 and Defendants Messner Reeves and Torben Welch to file their respective replies to their motions  
20 to dismiss an additional 14 days, until March 18, 2025. This is the first requested extension  
21 between the parties.

22 The requested extension will not prejudice any party and will allow the parties to  
23 adequately brief their responses to the Motions to Dismiss filed with this Court. The parties are  
24 not delaying the conclusion of this matter by way of trial or otherwise; no trial date has yet been

ordered.

DATED this 5th day of March, 2025.

DATED this 5th day of March, 2025.

TACSIS LAW APC

KAEMPFER CROWELL

/s/ John S. Manzano

/s/ Ryan Daniels

John S. Manzano

Lyssa S. Anderson

Francis Richard Mansano

Nevada Bar No. 5781

Ryan M. Arakawa

Ryan W. Daniels

Lorrie A. Walton

Nevada Bar No. 13094

3424 W. Carson Street, Suite 600

1980 Festival Plaza Drive, Suite 650

Torrance, CA 90503

Las Vegas, Nevada 89135

[law@tacsis.com](mailto:law@tacsis.com)

*Attorneys for Defendants*

Shawn R. Perez

*Jackie Robinson; All Net, LLC;*

LAW OFFICE OF SHAWN R. PEREZ

*Dribble Dunk, LLC; and Loring Jacobs*

7121 W. Craig Rd, #113-38

Las Vegas, NV 89129

[Shawn711@msn.com](mailto:Shawn711@msn.com)

*Attorneys for Plaintiffs*

DATED this 5th day of March, 2025.

GORDON REES SCULLY MANSUKHANI

/s/ William G. Dewey

Robert E. Schumacher

William G. Dewey

300 S. 4th St. Ste. 1550

Las Vegas, NV 89101

[rschumacher@grsm.com](mailto:rschumacher@grsm.com)

*Attorneys for Defendants*

*Messner Reeves and Torben Welch*

**IT IS SO ORDERED.**

**DATED:** this 6th day of March, 2025



**RICHARD F. BOULWARE, II**  
**UNITED STATES DISTRICT JUDGE**