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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

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THE DIGESTI LAW FIRM LLP  
485 W. FIFTH STREET, RENO, NV 89503

\_\_\_\_\_  
JONATHAN REDFERN and )  
MARGARET REDFERN, individually and )  
As husband and wife, and as next friend )  
Of their minor children; )

Plaintiffs, )

vs. )

TRANSAMERICA MOVING, INC., a )  
California corporation; ALEXANDER )  
PLOTKIN, ALLA ZHUK, TONY )  
PLUMMER, FRANCISCO (last name )  
Unknown), and JOY (last name unknown), )  
All individually and doing business as )  
TRANSAMERICA MOVING, INC.; )  
BLACK and white CORPORAITONS; )  
ABLE and BAKER COMPANIES; RED )  
And GREEN PARTNERSHIPS; and )  
JOHN DOES I through X, inclusive, )

Defendants. )  
\_\_\_\_\_

Case No. 3:09-cv-317-LRH-VPC

**STIPULATION TO EXTEND  
THE FILING DEADLINES FOR  
PLAINTIFFS' OPPOSITION  
TO DEFENDANT'S MOTION TO  
DISMISS, OR IN THE  
ALTERNATIVE, MOTION TO  
STRIKE AND DEFENDANT'S  
REPLY TO PLAINTIFFS'  
OPPOSITION ; ORDER**

On November 16, 2009, a hearing was held before the Honorable Magistrate Cooke on Plaintiffs' Motion for Leave to Amend Complaint and Motion for Service by Publication. During the hearing, Magistrate Cooke and the parties agreed upon a briefing schedule for Defendant's

1 Motion to Dismiss, or in the Alternative, Motion to Strike. Defendant filed the Motion on December  
2 3, 2009. Plaintiffs' Opposition is due on December 20, 2009.

3 During the FRCP 26(f) conference held on December 9, 2009, the parties agreed to stipulate  
4 to a mutually convenient extension of Plaintiffs' Opposition to January 6, 2010 and Defendant's  
5 Reply to the Opposition in accordance with Local Rule 7-2. The parties hereby respectfully request  
6 that the Court extend the filing deadline for Plaintiffs' Opposition to Defendant's Motion to Dismiss,  
7 or in the Alternative, Motion to Strike, to January 6, 2010 and Defendant's Reply to the Opposition  
8 in accordance with Local Rule 7-2.

9  
10 DATED: December 10, 2009

THE **DIGESTI** LAW FIRM LLP

11  
12 By: \_\_\_\_\_/s/  
13 Matthew P. Digesti, Esq. (SBN 9793)  
14 485 W. Fifth Street  
15 Reno, NV 89503  
16 Attorneys for the Defendant  
17 Transamerica Moving, Inc.

18 DATED: December 10, 2009

MacDonald + MacDonald, P.C.

19 By: \_\_\_\_\_/s/  
20 Mark E. MacDonald, Esq. (SBN 1275830)  
21 9938 Ontario  
22 Dallas, TX 75220  
23 Attorneys for Plaintiffs  
24 Jonathan Redfern, Margaret Redfern, individually  
25 and as husband and wife, and as next friend of  
26 their minor children.

27  
28 **IT IS SO ORDERED** this 15th day of December, 2009.



\_\_\_\_\_  
LARRY R. HICKS  
UNITED STATES DISTRICT JUDGE