```
1
   Chaim Z. Appel, Esq. (Admitted pro hac vice)
   New York State Bar No. 4849444
   APPEL LAW FIRM PLLC
   4533-16 Avenue
 3
   Brooklyn, New York 11204
   Telephone: (212) 252-2045 Facsimile: (718) 972-3371
   cappel@CustomsAndLaw.com
5
   John K. Gallagher, Esq.
   Nevada State Bar No. 956
   GUILD, GALLAGHER & FULLER, LTD.
   100 West Liberty Street, Suite 800
   Reno, Nevada 89501
   Telephone: (775) 786-2366
   Facsimile: (775) 322-9105
   jgallagher@ggfltd.com
10
   Attorneys for Plaintiffs
11
                           UNITED STATES DISTRICT COURT
12
                                 DISTRICT OF NEVADA
13
   JOSEPH WEINFELD, LIANA KNIJNIKOVA, )
                                                 Case No. 3:14-cv-00513-RCJ-WGC
   ISAAC WEISS, ROBERT FRANK,
14 YEHUDAH NUSSBAUM, MOSES
                                                 STIPULATION AND ORDER TO
   STEINMETZ, ALBERT ISAAC, JOSEF
                                              EXTEND PLAINTIFFS' TIME TO FILE
15 KOHN, MICHAEL FRIEDMAN and
                                               AN OPPOSITION TO DEFENDANTS'
   CONGREGATION BETH JOSEPH,
                                                MOTION FOR FEES AND COSTS
   Derivatively on behalf of PRECIOUS
   MINERAL'S MINING AND REFINING
                                                         (Second Request)
17
   CORP.,
18
   Plaintiffs,
19
20
   BILL L. MINOR, JOHN H. REYNOLDS, and
   WALTER A. MARTING, JR.,
21
   Defendants.
22
           and
23
   PRECIOUS MINERALS MINING AND
24
   REFINING CORP., a Nevada corporation.
25
                       Nominal Defendant.
26
27
         Plaintiffs JOSEPH WEINFELD, LIANA KNIJNIKOVA, ISAAC WEISS, ROBERT
28
   FRANK, YEHUDAH NUSSBAUM, MOSES STEINMETZ, ALBERT ISAAC, JOSEF KOHN,
```

```
1
   MICHAEL FRIEDMAN and CONGREGATION BETH JOSEPH, derivatively on behalf of
   PRECIOUS MINERALS MINING AND REFINING CORP. (hereinafter "Plaintiffs"), and
   Defendants BILL L. MINOR, JOHN H. REYNOLDS, and WALTER A. MARTING, JR.
   (hereinafter "Defendants"), pursuant to LR IA 6-1, LR IA 6-2 and LR II 7-1, hereby stipulate and
 5
   agree as follows:
 6
           WHEREAS, on March 27, 2018, this Court entered its Order and Judgment in this case for
   Defendants, [ECF No. 157-8], on April 10, 2018, Defendants filed Defendants' Motion for
   Attorneys' Fees and Costs (hereinafter "Motion"), [ECF No. 160], and on April 24, 2018, the
   Court entered a Stipulation and Order to Extend Plaintiffs' Time to File an Opposition to
10
   Defendants' Motion for Fees and Costs in this matter extending the deadline for Plaintiffs to file
11
   an opposition to the Motion to the current deadline of Tuesday, May 22, 2018;
12
           Given that Defendants' Motion is directed at each of the remaining eight (8) individual
13
   Plaintiffs, with whom their counsel required time to meet individually to review and respond to
14
   Defendants' Motion, and that Plaintiffs' counsel had a religious obligation that prevented him
15
   from working on this matter from Friday evening, May 18, 2018, until Monday evening, May 21,
16 2018;
17
           This is the second stipulation for extension of time to file an opposition to a motion;
18
           This stipulation is made by the parties in good faith and not for any improper purpose;
19 // // //
20 // // //
21 | // // //
22 | // // //
23 // // //
24 // // //
25 | // // //
26 | // // //
27 |
   // // //
28 // // //
```

Case 3:14-cv-00513-RCJ-WGC Document 174 Filed 05/22/18 Page 3 of 3

1	NOW, THEREFORE, and good cause appearing, it is hereby stipulated and agreed as
2	follows:
3	1. The current deadline to oppose Defendants' Motion shall be extended for a period
4	of one (1) week, such that the deadline for Plaintiffs to file their opposition to Defendants' Motion
5	shall be extended to expire on Tuesday, May 29, 2018.
6	DATED the 22nd day of May, 2018.
7	LAW OFFICES OF MICHAEL J. APPEL LAW FIRM PLLC MORRISON
8	
9	By: /s/ Michael J. Morrison Michael J. Morrison, Esq. By: /s/ Chaim Z. Appel Chaim Z. Appel, Esq. (pro hac vice)
10	Nevada State Bar No. 1665 4533-16 Avenue 1495 Ridgeview Drive, Suite 220 Brooklyn, New York 11204
11	Reno, NV 89519 (212) 252-2045 (phone) Tel. (775) 827-6300 (718) 872-3371 (fax)
12	venturelawusa@gmail.com cappel@customsandlaw.com
13	Counsel for Defendants Counsel for Plaintiffs
14	
15	
16	IT IS SO ORDERED:
17	INVERDOR AT A THE MADE
18	UNITED STATES MAGISTRATE JUDGE
19	DATED: May 24 2018
20 21	
22	
23	
24	
25	
26	
27	
28	
	3
	· · · · · · · · · · · · · · · · · · ·