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17 *Attorneys for Plaintiff and Counter Defendants*

18 **UNITED STATES DISTRICT COURT**
 19 **DISTRICT OF NEVADA**

20 CHEMEON SURFACE TECHNOLOGY, LLC, a
 21 Nevada limited liability company,

22 Plaintiff,

23 v.

24 METALAST INTERNATIONAL, INC., a Nevada
 25 corporation; METALAST, INC., a Nevada
 26 corporation; SIERRA DORADO, INC., a Nevada
 27 corporation; DAVID M. SEMAS, an individual;
 28 GREG D. SEMAS, an individual; and WENDI
 SEMAS-FAURIA, an individual.

29 Defendants.

30 DAVID M. SEMAS; and METALAST
 31 INTERNATIONAL, INC.,

32 Counterclaimants,

33 v.

34 CHEMEON SURFACE TECHNOLOGY, LLC,
 35 DEAN S. MEILING; and MADYLON
 36 MEILING,

37 Counter Defendants.

38 Case No.: 3:15-cv-00294-MMD-VPC

39 **STIPULATION and [PROPOSED]**
 40 **ORDER TO EXTEND BRIEFING**
 41 **SCHEDULE**
 42 **[FIRST REQUEST]**

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1 CHEMEON SURFACE TECHNOLOGY, LLC, a
2 Nevada limited liability company,
3
4 Plaintiff,
5
6 v.
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8 MHA GROUP, a company; and MARC HARRIS,
9 an individual.
10
11 Defendants.12

Consolidated with:
Case No. 3:15-cv-00295-MMD-VPC

13 Plaintiff/Counter defendants CHEMEON Surface Technology and Counter Defendants
14 Dean S. Meiling and Madylon Meiling (collectively “CHEMEON”), by and through their
15 undersigned counsel, Robert C. Ryan of Holland & Hart, LLP; Defendants Metalast International,
16 Inc., Metalast, Inc., Sierra Dorado, Inc., David M. Semas, and Counterclaimants Metalast
17 International, Inc. and David M. Semas (collectively “Metalast Defendants”), by and through their
18 undersigned counsel, Michael D. Hoy of Hoy Chrissinger Kimmel Vallas, PC, stipulate and agree
19 as follows:

- 20 1. The Court entered its Order (ECF No. 398) concerning three motions for summary
21 judgment (ECF Nos. 313, 314, 331) on March 30, 2018.
- 22 2. The Order directed CHEMEON and the Metalast Defendants to provide
23 supplemental briefing within seven (7) days of the Order.
- 24 3. Pursuant to the Order, the supplemental briefing is due April 6, 2018.
- 25 4. The parties agree to a short extension to April 10, 2018, within which to file the
26 supplemental briefs.
- 27 5. This extension is agreed to and requested from the Court because counsel for
28 Plaintiff has had matters requiring immediate action this week which has impacted the ability to
finalize the briefing required by this Court. Counsel for the Metalast Defendants has no objection
to the short extension.

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- 6. This is the first request for an extension of time to file the supplemental briefs.
- 7. This request for an extension is made in good faith and not for purposes of delay.

IT IS SO STIPULATED.

DATED this 5th day of April, 2018.

DATED this 5th day of April, 2018.


HOLLAND & HART LLP

HOY CHRISSINGER KIMMEL PC

/s/ Robert C. Ryan
Robert C. Ryan (7164)
Tamara Reid (9840)
5441 Kietzke Lane, Second Floor
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LLC, Dean S. Meiling, and Madylon Meiling*

/s/ Michael D. Hoy
Michael D. Hoy (2723)
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*Attorneys for Metalast International, Inc.,
Metalast, Inc., Sierra Dorado, Inc., David M.
Semas, Greg D. Semas, and Wendi Semas-
Fauria*

IT IS SO ORDERED.



UNITED STATES DISTRICT JUDGE

DATED: April 5, 2018

PROOF OF SERVICE

Pursuant to FRCP 5, I, Gay Groves, declare, as follows:

I am employed in the City of Reno, County of Washoe, State of Nevada, by the law offices of Holland & Hart. My business address is 5441 Kietzke Lane, Second Floor, Reno, Nevada 89511. I am over the age of 18 years and not a party to this action.

I am readily familiar with Holland & Hart’s practice for collection and processing of: HAND DELIVERIES, FACSIMILES and OUTGOING MAIL. Such practice in the ordinary course of business provides for the delivery or faxing and/or mailing with the United States Postal Service, to occur on the same day the document is collected and processed.

On April 5, 2018, I served the foregoing, **STIPULATION and [PROPOSED] ORDER TO EXTEND BRIEFING SCHEDULE [FIRST REQUEST]**, as follows:

ELECTRONIC: by electronic transmission through the United States District Court’s CM/ECF system to the parties below:

Michael D. Hoy
HOY CHRISSINGER KIMMEL
Bank of America Tower
50 West Liberty Street, Suite 840
Reno, Nevada 89501
Telephone: (775) 786-8000
Facsimile: (775) 786-7426
mhoy@nevadalaw.com

Attorneys for Defendants

U.S. MAIL: by placing a true copy thereof in Holland & Hart’s outgoing mail in a sealed envelope addressed as follows:

Marc Harris
2471 Morning Dew Drive
Brea, CA 92821
Telephone: 714-642-1021
Email: Marcharr3@hotmail.com

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this declaration was executed on April 5, 2018.

/s/ Gay Groves

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