

HOLLAND & HART LLP
5441 Kietzke Lane, 2nd Floor
Reno, NV 89511

Phone: (775) 327-3000 ♦ Fax: (775) 786-6179

1 Robert C. Ryan (#7164)
2 Timothy A. Lukas, Esq. (#4678)
3 Tamara Reid (#9840)
4 HOLLAND & HART LLP
5 5441 Kietzke Lane, Second Floor
6 Reno, Nevada 89511
7 Phone: (775) 327-3042
8 Fax: (775) 786-6179
9 reryan@hollandhart.com
10 treid@hollandhart.com

11 Christopher B. Hadley (admitted *pro hac vice*)
12 JONES, WALDO, HOLBROOK &
13 MCDONOUGH, PC
14 1441 West Ute Blvd, Suite 330
15 Park City, Utah 8409860
16 Phone: (435) 200-0085
17 Fax: (435) 200-0084
18 cbhadley@joneswaldo.com

19 *Attorneys for Plaintiff and Counter Defendants*

20 **UNITED STATES DISTRICT COURT**
21 **DISTRICT OF NEVADA**

22 CHEMEON SURFACE TECHNOLOGY, LLC, a
23 Nevada limited liability company,

24 Plaintiff,

25 v.

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

Defendants.

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

**STIPULATION and [PROPOSED]
ORDER TO EXTEND BRIEFING
SCHEDULE
[FIRST REQUEST]**

And Related Actions.

Plaintiff/Counter Defendant Chemeon Surface Technology and Counter Defendants Dean S. Meiling and Madylon Meiling (collectively "CHEMEON"), by and through their undersigned counsel, Robert C. Ryan of Holland & Hart, LLP, and Defendants David M. Semas and Greg D. Semas, by and through their undersigned counsel, Michael D. Hoy of Hoy Chrissinger Kimmel Vallas, PC, stipulate and agree as follows:

1 1. CHEMEON filed its Motion for Reconsideration of Summary Judgment Order on
2 April 24, 2018 [ECF No. 412].

3 2. Defendants filed their Opposition to the Motion for Reconsideration on May 1,
4 2018. [ECF No. 413].

5 3. The current deadline for CHEMEON to file its reply is May 8, 2018.

6 4. The parties hereby stipulate to a three (3) day extension of the deadline for
7 CHEMEON to file its reply brief. CHEMEON shall have through Friday, May 11, 2018 within
8 which to file its reply brief.

9 5. This extension is agreed to and requested from the Court because CHEMEON's
10 counsel primarily tasked with the briefing, Mr. Ryan, was sidelined by a serious medical issue that
11 kept him out of the office from April 26-30, 2018, and continuing to deal with the issue through
12 part of last week.

13 6. This is the first request for an extension of time to file the reply brief.

14 7. This request for an extension is made in good faith and not for purposes of delay.

15 IT IS SO STIPULATED.

16 DATED this 7th day of May, 2018

DATED this 7th day of May, 2018

17 HOLLAND & HART LLP

HOY CHRISSINGER KIMMEL VALLAS, PC

18 /s/ Tamara Reid
19 Robert C. Ryan (7164)
20 Tamara Reid (9840)
21 5441 Kietzke Lane, Second Floor
22 Reno, Nevada 89511
23 *Attorneys for Chemeon Surface Technology,
24 LLC, Dean S. Meiling, and Madylon Meiling*

18 /s/ Michael Hoy
19 Michael D. Hoy (2723)
20 Bank of America Tower
21 50 West Liberty Street, Suite 840
22 Reno, Nevada 89501
23 Telephone: (775) 786-8000
24 Facsimile: (775) 786-7426
25 *Attorneys for David M. Semas and Greg D.
26 Semas*

27 **IT IS SO ORDERED.**

28 **UNITED STATES DISTRICT JUDGE**


DATED: May 7, 2018

1 **PROOF OF SERVICE**

2 Pursuant to FRCP 5, I, declare, as follows:

3 I am employed in the City of Reno, County of Washoe, State of Nevada, by the law offices
4 of Holland & Hart. My business address is 5441 Kietzke Lane, Second Floor, Reno, Nevada
5 89511. I am over the age of 18 years and not a party to this action.

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

10 On May 7, 2018, I served the foregoing, **STIPULATION and [PROPOSED] ORDER
11 TO EXTEND BRIEFING SCHEDULE**, as follows:

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

14 Michael D. Hoy
15 HOY CHRISSINGER KIMMEL VALLAS PC
16 Bank of America Tower
17 50 West Liberty Street, Suite 840
18 Reno, Nevada 89501
19 Telephone: (775) 786-8000
20 Facsimile: (775) 786-7426
21 mhoy@nevadalaw.com

22 *Attorneys for Defendants*

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

25 Marc Harris
26 2471 Morning Dew Drive
27 Brea, CA 92821
28 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 May 7, 2018.

/s/ Gay Groves

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Phone: (775) 327-3000 ♦ Fax: (775) 786-6179