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11 *Attorneys for Plaintiff and Counter Defendants*

12 **UNITED STATES DISTRICT COURT**
 13 **DISTRICT OF NEVADA**

14 CHEMEON SURFACE TECHNOLOGY, LLC, a
 15 Nevada limited liability company,

16 Plaintiff,

17 v.

18 METALAST INTERNATIONAL, INC., a Nevada
 corporation; METALAST, INC., a Nevada
 19 corporation; SIERRA DORADO, INC., a Nevada
 corporation; DAVID M. SEMAS, an individual;
 20 GREG D. SEMAS, an individual; and WENDI
 SEMAS-FAURIA, an individual.

21 Defendants.

22
 23 DAVID M. SEMAS; and METALAST
 INTERNATIONAL, INC.,

24 Counterclaimants,

25 v.

26 CHEMEON SURFACE TECHNOLOGY, LLC,
 DEAN S. MEILING; and MADYLON
 27 MEILING,

28 Counter Defendants.

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

**STIPULATION AND ORDER FOR
 EXTENSION OF TIME TO FILE
 RESPONSE TO GREG SEMAS'S
 RENEWED MOTION FOR SUMMARY
 JUDGMENT [DKT 427]**

[FIRST REQUEST]

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1 CHEMEON SURFACE TECHNOLOGY, LLC, a
2 Nevada limited liability company,
3
4 Plaintiff,
5
6 v.
7
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 CHEMEON Surface Technology (“CHEMEON”), by and through its undersigned
14 counsel, Timothy A. Lukas of Holland & Hart, LLP; and Defendant Greg Semas (“Semas”), by and
15 through his undersigned counsel, Michael D. Hoy of Hoy Chrissinger Kimmel Vallas, PC, stipulate
16 and agree as follows:

- 17 1. On July 25, 2018, Semas filed a Renewed Motion for Summary Judgment (Dkt. 427)
18 (“Motion”).
- 19 2. Chemeon’s deadline to file a response to the Motion is currently August 15, 2017.
- 20 3. Chemeon and Semas hereby stipulate to extend the deadline for Chemeon to respond
21 to the Motion to September 7, 2018.
- 22 4. This is Chemeon’s first request for an extension of time to file a response to the
23 Motion.
- 24 5. Pursuant to LR IA 6-1, this first request for an extension is made with good cause
25 and in good faith and not for purposes of delay. Because of the unavailability of Chemeon’s counsel
26 during periods of August, it be would very difficult and impose an undue burden on their client and
27 counsel to meet the current filing deadline for filing an opposition to Greg Semas’ renewed motion
28 for summary judgment in this case. Counsel do not believe that the short extension requested would
cause any undue delay in this case. Chemeon’s counsel believes the extension allows for a better
and more complete resolution of the pending motion and claims that may ultimately have to tried
to the Court.

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IT IS SO STIPULATED.

DATED this 9th day of August, 2018.

HOLLAND & HART LLP

/s/ Timothy A. Lukas
Robert C. Ryan (7164)
Timothy A. Lukas (#4678)
Tamara Reid (9840)
5441 Kietzke Lane, Second Floor
Reno, Nevada 89511
Attorneys for Chemeon Surface Technology

DATED this 9th day of August, 2018.

HOY CHRISSINGER KIMMEL PC

/s/ Michael D. Hoy
Michael D. Hoy (2723)
Bank of America Tower
50 West Liberty Street, Suite 840
Reno, Nevada 89501
Telephone: (775) 786-8000
Facsimile: (775) 786-7426
Attorneys for Greg D. Semas

IT IS SO ORDERED.



UNITED STATES DISTRICT JUDGE

DATED: August 9, 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 89511.
5 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: HAND
7 DELIVERIES, FACSIMILES and OUTGOING MAIL. Such practice in the ordinary course of
8 business provides for the delivery or faxing and/or mailing with the United States Postal Service, to
9 occur on the same day the document is collected and processed.

10 On August 9, 2018, I served the foregoing, **STIPULATION AND ORDER FOR**
11 **EXTENSION OF TIME TO FILE RESPONSE TO GREG SEMAS’S RENEWED MOTION**
12 **FOR SUMMARY JUDGMENT [DKT 427] [FIRST REQUEST]**, as follows:

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

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

23 *Attorneys for Defendants*

24 I declare under penalty of perjury under the laws of the United States of America that the
25 foregoing is true and correct, and that this declaration was executed on August 9, 2018.

26 /s/ Jeanette Sparks

27 11273614_1

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