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Attorneys for Plaintiff and Counter Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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

16 Plaintiff,

17 v.

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

24 Defendants.

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

24 Counterclaimants,

25 v.

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

Counter Defendants.

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

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

[SECOND REQUEST]

1 Plaintiff CHEMEON Surface Technology (“CHEMEON”), by and through its undersigned
2 counsel, Timothy A. Lukas of Holland & Hart, LLP; and Defendant Greg Semas (“Semas”), by and
3 through his undersigned counsel, Michael D. Hoy of Hoy Chrissinger Kimmel Vallas, PC, stipulate
4 and agree as follows:

5 1. On July 25, 2018, Semas filed a Renewed Motion for Summary Judgment (Dkt. 427)
6 (“Motion”).

7 2. Chemeon’s deadline to file a response to the Motion was August 15, 2018.

8 3. Chemeon and Semas stipulated to extend the deadline for Chemeon to respond to the
9 Motion to September 7, 2018. The Court approved the Stipulation. (ECF 432).

10 4. Chemeon and Semas hereby stipulate to further extend the deadline for Chemeon to
11 respond to the Motion to September 10, 2018.

12 5. This is Chemeon’s second request for an extension of time to file a response to the
13 Motion.

14 6. Pursuant to LR IA 6-1, this second request for an extension is made with good cause
15 and in good faith and not for purposes of delay. Due to personnel departures of prior associated
16 counsel and the availability of the remaining counsel for Chemeon, it be would very difficult and
17 impose an undue burden on their client and counsel to meet the current filing deadline for filing an
18 opposition to Greg Semas’ renewed motion for summary judgment in this case. Counsel do not
19 believe that the short extension requested would cause any undue delay in this case. Chemeon’s
20 counsel believes the extension allows for a better and more complete resolution of the pending
21 motion and claims that may ultimately have to tried to the Court.

22 IT IS SO STIPULATED.

23 DATED this 7th day of September, 2018.

DATED this 7th day of September, 2018.

24 HOLLAND & HART LLP

HOY CHRISSINGER KIMMEL PC

25 /s/ Timothy A. Lukas
26 Robert C. Ryan (7164)
27 Timothy A. Lukas (#4678)
28 5441 Kietzke Lane, Second Floor
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Attorneys for Chemeon Surface Technology

/s/ Michael D. Hoy
Michael D. Hoy (2723)
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Attorneys for Greg D. Semas

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IT IS SO ORDERED.

UNITED STATES DISTRICT JUDGE



DATED: September 10, 2018

PROOF OF SERVICE

Pursuant to FRCP 5, I 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 September 7, 2018, I served the foregoing, **STIPULATION AND ORDER FOR EXTENSION OF TIME TO FILE RESPONSE TO GREG SEMAS’S RENEWED MOTION FOR SUMMARY JUDGMENT [DKT 427] [SECOND REQUEST]**, as follows:

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

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Attorneys for Defendants

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 September 7, 2018.

/s/ Jeanette Sparks

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