

1 Michael D. Hoy (NV Bar 2723)
2 HOY CHRISSINGER KIMMEL VALLAS, PC
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5 775.786.8000

6 Attorneys for Defendants

7 **United States District Court**
8 **District of Nevada**

9 CHEMEON SURFACE TECHNOLOGY, LLC,
10
11 Plaintiff,

12 v.

13 METALAST INTERNATIONAL, INC.; METALAST, INC.;
14 SIERRA DORADO, INC.; DAVID M. SEMAS; GREG D.
15 SEMAS; and WENDI SEMAS-FAURIA,

16 Defendants.

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

**Stipulation and Order for Extension
of Time to File Joint Pretrial Order**

[First Request]

17 And Related Claims

18 Through counsel, all parties stipulate:

19 1. On May 13, 2019, this Court referred this case to a United States magistrate judge
20 to conduct all proceedings.

21 2. At the June 11, 2019 status conference, the Court ordered that the parties shall
22 file the Joint Pretrial Order under LR 16-4 ("JPO") not later than close of business on Thursday,
23 August 1, 2019. ECF No. 497.

24 3. Michael Hoy was scheduled to commence a two-week bench trial on July 30,
25 2019 in Department 15 of the Second Judicial District Court. That case involves complex
26 construction scheduling issues, and claims for more than \$5 million. The case required
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HOY | CHRISSINGER
KIMMEL | VALLAS
ATTORNEYS AND COUNSELORS AT LAW





1 significant post-discovery period deposition and motion practice. On July 22, 2019, the case
2 settled.

3 4. On or about July 18, 2019, Timothy Lukas and Hoy discussed the timing of the
4 JPO. Because of his trial preparation, and anticipated unavailability through August 9, 2019,
5 Hoy suggested a 30-day postponement and Lukas agreed. In reliance on that agreement, Lukas
6 halted work on the JPO.
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8 5. The parties shall file the JPO not later than Friday, August 23, 2019.

9 6. This is the first request by any party to extend the time to file the JPO from the
10 date set by the Court's prior order (ECF No. 497).
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12 7. Pursuant to LR IS 6-1, this request is made with good cause and in good faith,
13 and not for purposes of delay.
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15 **IT IS SO STIPULATED.**

16 Dated July 24, 2019.

17 HOLLAND & HART LLP
18 5441 Kietzke Lane, Second Floor
19 Reno, Nevada 89511
20 (775) 327-3000

21 /s/ Timothy A. Lukas

22 Robert C. Ryan (NV 7164)
23 Timothy A. Lukas (NV 4678)
24 Attorneys for Chemeon Surface Technology,
25 LLC; Dean S. Meiling; and Madylon Meiling

Dated July 24, 2019.

HOY CHRISSINGER KIMMEL VALLAS, PC
50 West Liberty Street, Suite 840
Reno, Nevada 89501
(775) 786-8000

26 Michael D. Hoy (NV 2723)
27 Attorneys for Metalast International, Inc.;
28 Metalast, Inc.; Sierra Dorado, Inc.; David M.
Semas; Greg D. Semas; and Wendi Semas-
Fauria

IT IS SO ORDERED.
Dated: July 26, 2019.

UNITED STATES MAGISTRATE JUDGE

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IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

XXXXXXXXXXXXXXXXXXXXXXXXXXXX
Dated:

Proof of Service

Pursuant to FRCP 5, Shondel Seth declares:

I am an employee of Hoy Chrissinger Kimmel Vallas, PC. On July 24, 2019,, I electronically filed the foregoing document upon the parties who are registered with the CM/ECF system, which will send a notice of electronic filing to: Robert C. Ryan, Timothy A. Lukas, and Christopher B. Hadley, all counsel for plaintiff and counter defendants.

/s/ Shondel Seth
Shondel Seth

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