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25 Attorneys for Defendants Dean Meiling, Madylon Meiling,  
26 Chemeon Surface Technology, LLC, Metalast Surface Technology,  
27 LLC, D&M-MI, LLC, DSM Partners, Ltd., and Meiling Family Partners, Ltd.

**THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF NEVADA**

28 JERRY ALEXANDER, et al., on behalf of  
29 themselves and all others similarly situated,

Plaintiffs,

v.

DEAN MEILING, et al.

Defendants.

**CASE NO.: 16-cv-00572-MMD-CLB**

**STIPULATION AND ORDER FOR  
EXTENSION OF TIME TO FILE  
RESPONSES TO DEFENDANTS'  
MOTIONS TO DISMISS AND REPLIES**

**[FIRST REQUEST]**

Plaintiffs and Defendants, by and through their undersigned counsel stipulate and agree as follows:

1           1.       On November 19, 2019, Defendants Dean Meiling, Madylon Meiling, Chemeon  
2 Surface Technology, LLC, Metalast Surface Technology, LLC, D&M-MI, LLC, DSM Partners, Ltd.,  
3 and Meiling Family Partners, Ltd. (collectively, “Meiling Defendants”) filed their Renewed Motion  
4 to Dismiss (ECF No. 134) and Special Motion to Dismiss (ECF No. 137).

5           2.       On November 22, 2019, Defendant Janet Chubb filed her Motion to Dismiss Claims  
6 Contained in Class Action (ECF No. 140) and joinders to the Meiling Defendants’ motions (ECF  
7 Nos. 138 and 139).

8           3.       Pursuant to Local Rule 7-2(b), Plaintiffs responses to the Meiling Defendants motions  
9 are due on December 3, 2019, and their response to the Chubb Defendant motion is due on December  
10 6, 2019.

11          4.       The parties hereby stipulate to extend the deadline for Plaintiffs to respond to the  
12 Meiling Defendants’ motions and Chubb’s motion until December 13, 2019; and, Defendants shall  
13 have until January 3, 2020 to file their replies.

14          5.       Pursuant to LR 6-1, this first request for an extension is made with good cause and in  
15 good faith and not for purposes of delay. The parties in this action have worked to coordinate the  
16 timing of filing pleadings in this case and affiliated cases in a consolidated fashion and to account  
17 for the availability of counsel over the holiday periods. This is the Parties’ first request for an  
18 extension of time to file responses to the motions and replies. Counsel do not believe that the  
19 extension requested would cause any undue delay in this case.

20               IT IS SO STIPULATED.

21               DATED this 3rd day of December, 2019.

22               HOLLAND & HART LLP

                  HARTMAN & HARTMAN

23               /s/ Timothy A. Lukas  
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                  Attorneys for Defendants James Proctor and  
                  Meridian Advantage

                  ///

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**IT IS SO ORDERED.**

  
\_\_\_\_\_  
**UNITED STATES DISTRICT JUDGE/**

DATED: December 4, 2019  
\_\_\_\_\_

**PROOF OF SERVICE**

Pursuant to FRCP 5, I, Audrey Brown, 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 December 3, 2019, I caused the foregoing **STIPULATION AND ORDER FOR EXTENSION OF TIME TO FILE RESPONSES TO DEFENDANTS’ MOTIONS TO DIMISS AND REPLIES [FIRST REQUEST]** to be served by the following method(s), 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 Defendant Janet Chubb

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 December 3, 2019.

/s/ Audrey Brown  
An employee of Holland & Hart

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