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10 Attorneys for Plaintiffs

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

13 JERRY ALEXANDER, et al., on behalf  
 themselves and all others similarly situated

14 Plaintiffs,

15 v.

16 DEAN MEILING, MADYLON MEILING,  
 17 JAMES PROCTOR, JANET CHUBB,  
 individuals, CHEMEON SURFACE  
 18 TECHNOLOGY, LLC, METALAST SURFACE  
 TECHNOLOGY, LLC, D&M-MI, LLC, DSM  
 19 PARTNERS, LTD., MEILING FAMILY  
 PARTNERS, LTD., and MERIDIAN  
 20 ADVANTAGE,

21 Defendants.

CASE NO.: 3:16-cv-00572-MMD-CBC

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

**(SECOND REQUEST)**

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

24 1. On November 19, 2019, Defendants Dean Meiling, Madylon Meiling, Chemeon  
 25 Surface Technology, LLC, Metalast Surface Technology, LLC, D&M-MI, LLC, DSM Partners,  
 26 Ltd., and Meiling Family Partners, Ltd. (collectively, "Meiling Defendants") filed their  
 27 Renewed Motion to Dismiss (ECF No. 134) and Special Motion to Dismiss (ECF No. 137), as  
 28 well as their Request for Judicial Notice related to the Renewed Motion to Dismiss (ECF No.

1 135) and Declaration of Timothy A. Lukas (ECF No. 136) (together, the “Meiling Defendants’  
2 Motions”).

3 2. On November 22, 2019, Defendant Janet Chubb filed her Motion to Dismiss  
4 Claims Contained in Class Action (ECF No. 140) and joinders to the Meiling Defendants’  
5 Motions (ECF Nos. 138 and 139) (together, the Chubb Defendant’s Motions”).

6 3. Pursuant to LR II 7-2(b), Plaintiffs responses to the Meiling Defendants Motions  
7 were due on or before December 3, 2019, and their response to the Chubb Defendant Motions  
8 was due on or before December 6, 2019.

9 4. On December 4, 2019, this Court granted the Parties’ stipulation to resetting the  
10 due dates for responses to the Meiling Defendants’ Motions and the Chubb Defendant’s Motions  
11 (ECF No. 142), which set a new due date of December 13, 2019. This Stipulation further  
12 extended the deadline for the Meiling Defendants and the Chubb Defendant to file reply briefs  
13 to January 3, 2020.

14 5. The parties hereby stipulate to extend the deadline for Plaintiffs to respond to the  
15 Meiling Defendants’ Motions and Chubb Defendant’s Motion until December 16, 2019, an  
16 extension of three (3) calendar days.

17 6. The parties hereby further stipulate to extend the deadline for the Meiling  
18 Defendants and the Chubb Defendant to file reply briefs until January 6, 2020, an extension of  
19 three (3) calendar days

20 7. Pursuant to LR IA 6-1, this second request for an extension for Plaintiffs to file  
21 their response briefs and for the Meiling Defendants’ Motions and the Chubb Defendant to file  
22 their reply briefs. Plaintiffs make this request with good cause and in good faith and not for  
23 purposes of delay. The Parties in this action have worked to coordinate the timing for filing  
24 pleadings in this case and affiliated cases in a consolidated fashion, and to account for the  
25 availability of counsel over the holiday periods. This particular request is made to accommodate  
26 the deposition calendar for Plaintiffs’ counsel in a different matter along with complexities in  
27 Plaintiffs’ review and analysis of draft responses to the Meiling Defendants’ Motions and the  
28 Chubb Defendant’s Motions given the large number of putative class plaintiffs. This is the

1 Parties' second request for an extension of time to file responses to the motions. Counsel do not  
2 believe that the brief extension requested herein will cause any undue delay in this action.

3 IT IS SO STIPULATED.

4 DATED this 13th day of December, 2019.

5 HOLLAND & HART LLP

HARTMAN & HARTMAN

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24 Partners, Ltd., and Meiling Family Partners,  
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Attorneys for Plaintiffs

26 IT IS SO ORDERED.



UNITED STATES DISTRICT JUDGE/

27 DATED:

December 16, 2019

**CERTIFICATE OF SERVICE**

Pursuant to Fed. R. Civ. P. 5(b), I certify that on the 13<sup>th</sup> day of December, 2019, I caused the document entitled **STIPULATION AND ORDER FOR EXTENSION OF TIME TO FILE RESPONSES TO DEFENDANTS' MOTIONS TO DISMISS AND RELATED FILINGS**, to be served as follows:

Attorneys of Record	Parties Represented	Method of Service
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/s/ Kathy MacElwain  
An employee of Holley Driggs Walch Fine  
Puzey Stein & Thompson