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20 **UNITED STATES DISTRICT COURT**

21 **DISTRICT OF NEVADA**

22 JERRY ALEXANDER, MARTY COHEN,  
23 CHARLES DELLE DONNE, RICHARD  
24 SCOTT ELDER, ARNIE GETTELSON,  
25 MARC HARRIS, JERRY HOLLANDER,  
26 ELIAS KASSOUFF, JEFF MACKINEN,  
27 DON MARSHALL, JERRY McDONALD,  
28 RON MELANSON, KEN MILES,  
MARVIN MILLS, MARC MORIN,  
ROBERT PARKER, DENNIS POULSEN,  
RON SMITH, ANDREW TANNER,  
CRAIG TIEFENTHALER, VIRGINIA  
WALLACE, and GERALD WOLFE, on  
behalf themselves and all others similarly  
situated,

Plaintiffs,

v.

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

Defendants.

Case No: 3:16-cv-00572-MMD-CLB

**STIPULATION AND [PROPOSED] ORDER  
TO EXTEND DUE DATES FOR  
PLAINTIFFS' FILING OF RESPONSES TO  
DEFENDANTS' BILL OF COST AND  
MOTION FOR ATTORNEY FEES**

(First Request)

1 IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs JERRY  
2 ALEXANDER, MARTY COHEN, CHARLES DELLE DONNE, RICHARD SCOTT ELDER,  
3 ARNIE GETTELSON, MARC HARRIS, JERRY HOLLANDER, ELIAS KASSOUF, JEFF  
4 MACKINEN, DON MARSHALL, JERRY MCDONALD, RON MELANSON, KEN MILES,  
5 MARVIN MILLS, MARC MORIN, ROBERT PARKER, DENNIS POULSEN, RON SMITH,  
6 ANDREW TANNER, CRAIG TIEFENTHALER, VIRGINIA WALLACE AND GERALD  
7 WOLFE (“Plaintiffs”) and Defendants DEAN MEILING, MADYLON MEILING, CHEMEON  
8 SURFACE TECHNOLOGY, LLC, METALAST SURFACE TECHNOLOGY, LLC, D&M-MI,  
9 LLC, DSM PARTNERS, LTD., AND MEILING FAMILY PARTNERS, LTD. (collectively,  
10 “Meiling Defendants”), that the current due dates for Plaintiffs to file Responses to the Meiling  
11 Defendants’ Bill of Costs and Motion for Attorney Fees of August 17, 2020 and August 18, 2020,  
12 respectively, be extended an additional thirteen (13) and fourteen (14) days respectively, up to and  
13 including Tuesday, September 1, 2020. This is the first request to extend either due date.

14 Plaintiffs’ counsel represent that good cause exists to extend these deadlines under LR IA  
15 6.1 because counsel for Plaintiffs have mandatory court hearings on August 17 and 18 in cases  
16 pending in California and Arizona that cannot be extended, and California counsel is also  
17 undergoing Covid testing on August 18, 2020 as the result of recent exposure to the virus that may  
18 require a quarantine which will make meeting the deadlines set forth herein very difficult, if not  
19 impossible. Plaintiffs’ counsel therefore submit that litigation of this matter will thus be best  
served by the proposed extensions.

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1 Accordingly, Plaintiffs respectfully request that the Court grant this stipulated request to  
2 continue the due date for filing responses to the Meiling Defendants' Bill of Costs and Motion for  
3 Attorney Fees until September 1, 2020.

4 Dated: August 16, 2020

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6 /s/ JAMES D. BOYLE

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Technology, LLC, D&M-MI, LLC, DSM  
19 Partners, Ltd., and Meiling Family Partners,  
Ltd.

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21 **ORDER**

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23 **IT IS SO ORDERED.**



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26 **UNITED STATES DISTRICT JUDGE**

27 DATED: August 18, 2020