1 2 3 4 5 6 7	John K. Gallagher, Esq. Nevada State Bar No. 956 S. Timothy Summers, Esq. Nevada State Bar No. 12285 GUILD, GALLAGHER & FULLER, LTD. 100 W. Liberty St., Ste. 800 P.O. Box 2838 Reno, NV 89505 Tele: (775) 786-2366 Fax: (775) 322-9105 jgallagher@ggfltd.com stsummers@ggfltd.com
8 9	Attorneys for Plaintiff Reno Technology Center 1, L.L.C.
10	UNITED STATES DISTRICT COURT
11	DISTRICT OF NEVADA
12	RENO TECHNOLOGY CENTER 1, L.L.C., a ) Case No. 3:17-ev-00410-LRH-WGC
13	Washington limited liability company,  Plaintiff,  )  STIPULATION AND ORDER TO EXTEND PRETRIAL DEADLINES
14	v. )
15	NEW CINGULAR WIRELESS PCS, LLC, a  Delaware limited liability company; and DOES  (First Request)
16	I-X, inclusive,
17	Defendant(s).
18	
19	Plaintiff RENO TECHNOLOGY CENTER 1, L.L.C. ("Reno Tech"), and Defendant NEW
20	CINGULAR WIRELESS PCS, LLC ("Cingular") (collectively "Parties"), pursuant to Local Rules
21	IA 6-1, II 7-1, and II 26-4, hereby stipulate and agree as follows:
22	WHEREAS, pursuant to Fed. R. Civ. P. 26(a)(3), Local Rules II 16-3 and 26-1, and the
23	Discovery Plan and Scheduling Order entered in this matter, the Parties must file a Proposed Joint
24	Pretrial Order after decision of any dispositive motions, and include with the filing their Pretrial
25	Disclosures and any objections. ECF No. 15, at 2:24-3:2.
26	On February 7, 2019, the Court entered its order denying the Parties' cross-motions for
27	summary judgment. ECF No. 37, at 16. Furthermore, the Court ordered the Parties "[to] submit
28	their proposed joint pretrial order pursuant to Local Rules 16-3 and 16-4 within sixty (60) days of
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	STIPULATION AND ORDER TO EXTEND PRETRIAL DEADLINES / CASE NO. 3:17-CV-00410-LRH-WGC

1 the entry of this order." *Id.* 17. On February 22, 2019, Reno Tech filed its motion for reconsideration of the Court's order, 2 3 and on August 16, 2019, the Court entered its order denying the motion. ECF Nos. 39, 42. Given the foregoing, the deadline for the Parties to file the Proposed Joint Pretrial Order and their Pretrial 4 5 Disclosures is October 15, 2019. WHEREAS, the Parties are now engaged in good faith efforts to arrange mediation for the 6 7 resolution of this matter without judicial intervention, and additional time is needed to make those arrangements. Furthermore, in light of these mediation efforts, additional time will also be needed 8 in the event it is necessary for the Parties and their counsel to confer, prepare, coordinate, and file 9 10 the foregoing pretrial documentation in a cogent, efficient manner for the Court's review and 11 consideration. WHEREAS, this is the first stipulation for extension of time to file the Proposed Joint 12 Pretrial Order and Pretrial Disclosures. This stipulation is made by the parties in good faith and 13 not for any improper purpose. 15 // // // 16 17 // // // 18 // // // 19 // // // 20 // // // 21 // // // 22 // // // 23 // // // 24 // // // 25 // // // 26 // // // 27 // // // 28 // // //

1	NOW, THEREFORE, and good cause appearing, it is hereby stipulated and agreed as
2	follows:
3	1. The current deadline for the Parties to file the Proposed Joint Pretrial Order and
4	their Pretrial Disclosures required under Fed. R. Civ. P. 26(a)(3) and any objections, which is set
5	for October 15, 2019, shall be extended for a period of fifty-six (56) days to expire on Tuesday,
6	December 10, 2019.
7	DATED this 3 day of October 2019.
8	GUILD, GALLAGHER & FULLER, LAW OFFICE OF STEVEN P. LTD. BRAZELTON
9	Alu-
10	By: By: Steven P. Brazelton, Esq.
11	Nevada State Bar No. 956 Nevada State Bar No. 5882
12	Nevada State Bar No. 12285 Nevada State Bar No. 5997
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16	stsummers@ggfltd.com Attorneys for Defendant Cingular Wireless PCS, LLC
17	Attorneys for Plaintiff Reno Technology Center 1, L.L.C.
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21	IT IS SO ORDERED:
22	Willem G. Cobb
23	UNITED STATES MAGISTRATE JUDGE
24	DATED: October 4, 2019
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