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12 *Counsel for Defendants Jeffrey L. Taylor, Don L. Taylor,*
L. John Lewis, S. Randall Oveson, and Gannon Giguere, and for
13 *Nominal Defendant Eco Science Solutions, Inc.*

14 UNITED STATES DISTRICT COURT
15 DISTRICT OF NEVADA

16 HANS MENOS, derivatively on behalf of
17 ECO SCIENCE SOLUTIONS, INC.,

18 Plaintiff,

19 v.

20 JEFFREY L. TAYLOR, DON L.
TAYLOR, L. JOHN LEWIS, S.
21 RANDALL OVESON, and GANNON
GIGUIERE,

22 Defendants,

23 and

24 ECO SCIENCE SOLUTIONS, INC.,

25 Nominal Defendant.
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Case No. 3:17-CV-00662-LRH-VPC

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINE FOR
DEFENDANTS AND NOMINAL
DEFENDANT TO RESPOND TO
COMPLAINT**

(First Request)

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1 **STIPULATION TO EXTEND DEADLINE FOR DEFENDANTS AND NOMINAL**
2 **DEFENDANT TO RESPOND TO COMPLAINT**

3 Pursuant to LR IA 6-1, LR IA 6-2, and LR 7-1, Defendants Jeffrey L. Taylor, Don L.
4 Taylor, L. John Lewis, S. Randall Oveson and Gannon Giguiere (collectively, “Defendants”) and
5 Nominal Defendant Eco Science Solutions, Inc. (“Nominal Defendant”), by and through their
6 counsel, the law firm of Greenberg Traurig, LLP, and Plaintiff Hans Menos, by and through his
7 counsel the law firms of Leverty & Associates Law Chtd. Ltd. and The Rosen Law Firm, P.A.,
8 hereby stipulate and agree to extend the deadline for the Defendants and the Nominal Defendant
9 to respond to the Complaint in this action by approximately sixty (60) days, through and
10 including **Monday, March 12, 2018**, and request that the Court enter an order approving the
11 same.

12 Counsel for Defendants and Nominal Defendants have requested additional time to
13 analyze the Complaint, particularly in light of additional derivative action complaints against
14 substantially the same defendants pending in multiple, different jurisdictions, and to prepare a
15 response and defense that best promotes convenience, economy and consistency and Plaintiffs’
16 counsel have agreed to the extension as a professional courtesy.

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1 This is the first stipulation for an extension of time for any of the Defendants or the
2 Nominal Defendant to respond to the Complaint.

3 Dated: January 5, 2018

Dated: January 5, 2018

4 By: /s/ Christopher R. Miltenberger

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6 Christopher R. Miltenberger
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16 *Attorneys for Defendants and*
17 *Nominal Defendant*

By: /s/ Patrick R. Leverty

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Attorneys for Plaintiff

18 IT IS SO ORDERED:

19 United States Magistrate Judge

20 DATED: January 8, 2018

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