

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

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

Plaintiff,

v.

JEFFERY L. TAYLOR, DON L.
TAYLOR, L. JOHN LEWIS, S.
RANDALL OVESON, and GANNON
GIGUIERE,

Defendants,

and

ECO SCIENCE SOLUTIONS, INC.,

Nominal Defendant.

Case No. 3:17-CV-00662-LRH-CBC

**STIPULATION AND
ORDER TO EXTEND DEADLINE FOR
PLAINTIFF'S RESPONSE TO MOTION
TO DISMISS AND DEFENDANTS'
REPLY THERETO

(First Request)**

1 Pursuant to LR IA 6-1, LR IA 6-2, and LR 7-1, Plaintiff Hans Menos, by and through his
2 counsel the law firms of Leverty & Associates Law Chtd. Ltd. and The Rosen Law Firm, P.A. and
3 Defendants Jeffery L. Taylor, Don L. Taylor, L. John Lewis, S. Randall Oveson and Gannon
4 Giguiere (collectively, “Individual Defendants”) and Nominal Defendant Eco Science Solutions,
5 Inc. (“Nominal Defendant” and with Individual Defendants, “Defendants”), by and through their
6 counsel, the law firm of Greenberg Traurig, LLP, hereby stipulate and agree to extend the deadline
7 for Plaintiff to respond to Defendants’ Motion to Dismiss Verified Stockholder Derivative
8 Complaint, filed on September 27, 2018 as Dkt. No. 42 (the “Motion to Dismiss”), by forty-five
9 (45) days, through and including November 26, 2018, and request that the Court enter an order
10 approving the same. Currently, Plaintiff’s opposition to the Motion to Dismiss is due on October
11 11, 2018.

12 Counsel for Plaintiff requests additional time due to several upcoming deadlines which
13 would make it difficult to file an opposition timely. Defendants’ counsel have agreed to the
14 extension as a professional courtesy.

15 Counsel for Plaintiff and counsel for Defendants hereby further stipulate and agree that
16 Defendants’ reply to Plaintiff’s response shall be due twenty-one (21) days thereafter, through and
17 including December 17, 2018, and request that the Court enter an order approving the same.

18 This is the first stipulation for an extension of time for Plaintiff to respond to the Motion
19 to Dismiss and for Defendants’ reply thereto.

20 Dated: October 1, 2018

By: /s/Patrick R. Leverty
Patrick R. Leverty
LEVERTY & ASSOCIATES LAW CHTD.
832 Willow Street
Reno, NV 89502

Phillip Kim
THE ROSEN LAW FIRM, P.A.
275 Madison Avenue, 34th Floor
New York, NY 10016

Attorneys for Plaintiff

28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated: October 1, 2018

By: /s/Joel M. Eads

Mark E. Ferrario
Christopher R. Miltenberger
GREENBERG TRAURIG, LLP
3773 Howard Hughes Parkway
Suite 400 North
Las Vegas, NV 89169

Joel M. Eads
GREENBERG TRAURIG, LLP
2700 Two Commerce Square
2001 Market Street
Philadelphia, PA 19103

Attorneys for Defendants and Nominal
Defendant

IT IS SO ORDERED:

DATED this 3rd day of October, 2018.



LARRY R. HICKS
UNITED STATES DISTRICT JUDGE