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 REGARDING THE FILING OF AN AMENDED COMPLAINT AND SCHEDULE FOR RESPONSE THERETO

(First Request)

STIPULATION REGARDING THE FILING OF AN AMENDED COMPLAINT AND SCHEDULE FOR RESPONSE THERETO

Pursuant to LR IA 6-1, LR IA 6-2, LR 7-1, and Fed. R. Civ. P. 15(a)(2), Plaintiff Hans Menos ("Plaintiff"), by and through his counsel the law firms of Leverty & Associates Law Chtd. Ltd. and The Rosen Law Firm, P.A. and Defendants Jeffery L. Taylor, Don L. Taylor, L. John Lewis, S. Randall Oveson and Gannon Giguiere (collectively, "Individual Defendants") and Nominal Defendant Eco Science Solutions, Inc. ("Nominal Defendant" and with Individual Defendants, "Defendants"), by and through their counsel, the law firm of Greenberg Traurig, LLP, hereby stipulate and agree that in lieu of responding to Defendants' Motion to Dismiss Verified Stockholder Derivative Complaint ("Motion to Dismiss") (Dkt. No. 42), Plaintiff will file an amended complaint on or before December 21, 2018.

Currently, the deadline for Plaintiff to file an opposition to Defendants' Motion to Dismiss is November 26, 2018. While preparing a response to Defendants' Motion to Dismiss, Plaintiff has determined it would be productive, as well as conserve party and judicial resources, to file an amended complaint instead of a response as new public information has been made available to Plaintiff since the filing of the initial complaint. Defendants' counsel has agreed to the filing of an amended complaint on or before December 21, 2018.

If the Court permits the filing of the amended complaint on or before December 21, 2018, the Parties agree that Defendants will have forty-five (45) days to respond to the amended complaint. If a motion to dismiss is filed, Plaintiff shall have forty-five (45) days after the filing of a motion to dismiss to file an opposition and Defendants shall have thirty (30) days after the filing of Plaintiff's opposition to file a reply.

This is the first stipulation for the scheduling of the filing of an amended complaint and response thereto. The Court previously granted Plaintiff's agreed-upon request for an an extension of time to respond to the Motion to Dismiss.

Dated: November 16, 2018

By: */s/Patrick R. Leverty*
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Dated: November 16, 2018

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Attorneys for Defendants and Nominal Defendant

IT IS SO ORDERED:

DATED this 20th day of November, 2018.

LARRY R. HICKS
UNITED STATES DISTRICT JUDGE