Menos v. Taylor et	al	Dpc.	63
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12	UNITED STATES	DISTRICT COURT	
13	DISTRICT OF NEVADA		
14	HANS MENOS, derivatively on behalf of ECO SCIENCE SOLUTIONS, INC.,	Case No. 3:17-CV-00662-LRH-CBC	
15	Plaintiff,		
16		STIPULATION AND ORDER REGARDING DEFENDANTS'	
17	JEFFERY L. TAYLOR, DON L.	RESPONSE TO AMENDED COMPLAINT [ECF 61]	
18	TAYLOR, L. JOHN LEWIS, S. RANDALL OVESON, and GANNON	(Third Request)	
19	GIGUIERE,	(Time Request)	
20	Defendants,		
21	and		
22	ECO SCIENCE SOLUTIONS, INC.,		
23	Nominal Defendant.		
24			
25	Pursuant to LR IA 6-1 and LR IA 6-2, Plaintiff Hans Menos ("Plaintiff"), by and through		
26	his counsel the law firms of Leverty & Associates Law Chtd. Ltd. and The Rosen Law Firm, P.A.		
27	and Defendants Jeffery L. Taylor, Don L. Taylor, L. John Lewis, S. Randall Oveson and Gannon		
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Giguiere (collectively, "Individual Defendants") and Nominal Defendant Eco Science Solutions, Inc. ("Nominal Defendant" and with Individual Defendants, "Defendants" and with Plaintiff, the "Parties"), by and through their counsel, the law firm of Greenberg Traurig, LLP, hereby stipulate and agree:

WHEREAS, on February 5, 2019, the Court entered the Parties' Stipulation and Order Regarding Defendants' Response to Amended Complaint and Plaintiffs' Response to the Emergency Motion to Stay Civil Case (the "February Order") (Dkt. No. 55). Pursuant to the February Order, if Judge Kobayashi denied the motion to stay in the related derivative actions, *Bell v. Taylor, et al.*, Case No. 17-cv-00530 (D. Hawaii) and *D'Annunzio v. Taylor, et al.*, Case No. 18-cv-00016 (D. Hawaii) (the "Hawaii Actions"), then Defendants will withdraw their Emergency Motion to Stay Civil Case ("Stay Motion") (Dkt. No. 52) and the Parties would agree to a schedule for the response to the Verified First Amended Shareholder Derivative Complaint ("Amended Complaint"). On April 26, 2019, Judge Kobayashi denied the motion to stay in the Hawaii Actions;

WHEREAS, on August 6, 2019, Defendants withdrew the Stay Motion (Dkt. No. 57).

WHEREAS, there are additional related proceedings in the United States District Court for the Southern District of California (*U.S. v. Giguiere*, Case No. 18CR3071-WQH) previously scheduled for an August trial but which resolved with a plea agreement on July 23, 2019;

WHEREAS, the parties in this action were monitoring the related proceedings, the closure of which provides some guidance to the prosecution and defense of this action;

WHEREAS, the parties in this action have preliminarily discussed alternative dispute resolution, are continuing these discussions, and require time to continue those discussions and potentially coordinate with the parties to the related derivative actions;

NOW, THEREFORE, the parties in this action stipulate and agree as follows:

1. Defendants shall file an answer to Plaintiff's Verified Amended Shareholder Derivative Complaint filed with this Court on December 21, 2018 (the "Amended Complaint") by September 13, 2019.

1	2. The parties will continue to discu	ss alternative dispute resolution.	
2	3. This request is made in good faith and not for the purpose of delay. Rather, the		
3	stipulation and schedule set forth above will further the efficient and expedient disposition of the		
4	above-captioned case.		
5	This is the third stipulation requesting a new deadline for the response to the Amended		
6	Complaint since a decision in the Hawaii Action on the stay issue.		
7			
8	Dated: September 10, 2019	Dated: September 10, 2019	
9	By: /s/ Patrick R. Leverty	By: /s/ Christopher R. Miltenberger	
10	Patrick R. Leverty LEVERTY & ASSOCIATES LAW CHTD.	Mark E. Ferrario Christopher R. Miltenberger	
11	832 Willow Street Reno, NV 89502	GREENBERG TRAURIG, LLP 10845 Griffith Peak Drive, Suite 600	
12		Las Vegas, NV 89135	
13	Phillip Kim THE ROSEN LAW FIRM, P.A.	Joel M. Eads	
14	275 Madison Avenue, 34 th Floor New York, NY 10016	GREENBERG TRAURIG, LLP 1717 Arch Street, Suite 400	
15	Attorneys for Plaintiff	Philadelphia, PA 19103	
16	Tittorneys you I taining)	Attorneys for Defendants and Nominal Defendant	
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18	IT IS SO ORDERED:, nunc pro tunc.		
19	DATED th	is 11th day of September, 2019.	
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22	LARRY R	A. HICKS STATES DISTRICT JUDGE	
23	UNITED	STATES DISTRICT JUDGE	
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