

DICKINSON WRIGHT PLLC

BRIAN R. IRVINE

Nevada Bar No. 7758

JUSTIN J. BUSTOS

Nevada Bar No. 10320

100 West Liberty St. Suite 940

Reno, NV 89501

Tel: (775) 343-7500

Fax: (844) 670-6009

birvine@dickinsonwright.com

jbustos@dickinsonwright.com

Attorneys for Plaintiffs Daniel Harrington,

Pamella Harrington, and Nightwatch

Marine, LLC in Case No. 3:18-cv-00028

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

NO. 8 MINE, LLC,

Plaintiff

v.

THE ELJEN GROUP, LLC, ELVEN E.
JENNINGS, JACK ELKINS, FRANK
LENTE, AND STEVE HARPER,

Defendants.

Case No.: 3:18-cv-00028-WGC
(consolidated for limited purpose with
Case No.: 3:18-cv-00104-WGC)

STIPULATION AND ORDER
EXTENDING TIME FOR FAY WARD TO
RESPOND TO SUBPOENA DUCES TECUM
(First Request)

THE ELJEN GROUP, LLC, ELVEN E.
JENNINGS, JACK ELKINS, FRANK
LENTE, AND STEVE HARPER,

Counter-Plaintiffs

v.

NO. 8 MINE, LLC,

Counter-Defendant



1 THE ELJEN GROUP, LLC, ELVEN E.
2 JENNINGS, JACK ELKINS, FRANK
3 LENTE, AND STEVE HARPER,

4 Third Party Plaintiffs

5 v.

6 DAVID TACKETT, ARGENT ASSET
7 GROUP, LLC, and ROBERT HIGGINS,

8 Third Party Defendants

9 DAVID TACKETT,

10 Counterclaimant

11 v.

12 THE ELJEN GROUP, LLC, ELVEN E.
13 JENNINGS, JACK ELKINS, FRANK
14 LENTE, AND STEVE HARPER,

15 Counter-Defendants

16 Pursuant to the United States District Court, District of Nevada Local Rules, Rule IA 6-1,
17 counsel for DANIEL HARRINGTON, PAMELLA HARRINGTON AND NIGHTWATCH
18 MARINE, LLC, Plaintiffs in Case No. 3:18-CV-00028-WGC (the “Harringtons”), and counsel for
19 third-party witness Fay Ward, through their respective attorneys state:

20 On September 10, 2019 a Subpoena Duces Tecum for documents and testimony was issued
21 to Fay Ward.

22 The Subpoena was served on September 11, 2019.

23 The current response date for Fay Ward to produce documents responsive to the Subpoena
24 is October 17, 2019 at her deposition scheduled for that day.

25 ///

26 ///

27 ///

28

1 Pursuant to Local Rule IA 6-1, the respective attorneys for the Harringtons and counsel for
2 Fay Ward agree to extend the time for Fay Ward to produce documents responsive to the Subpoena
3 Duces Tecum up to and including November 4, 2019 in order to allow Fay Ward additional time to
4 gather and produce responsive documents. The parties will reschedule the deposition of Fay Ward at a
5 convenient time for all parties and their counsel.

6 **IT IS SO STIPULATED.**

7
8 Dated this 15th day of October, 2019.

Dated this 15th day of October, 2019.

9 /s/ Brian R. Irvine
10 BRIAN R. IRVINE
11 Nevada Bar No. 7758
12 JUSTIN J. BUSTOS
13 Nevada Bar No. 10320
14 DICKINSON WRIGHT PLLC
15 100 West Liberty St. Suite 940
16 Reno, NV 89501

/s/ John R. Funk
GUNDERSON LAW FIRM
John R. Funk, Esq.
Nevada State Bar No. 12372
3895 Warren Way
Reno, Nevada 89509

Attorneys for Fay Ward

*Attorneys for Daniel Harrington, Pamella
Harrington, and Nightwatch Marine, LLC*

17 * * *

ORDER

18 IT IS SO ORDERED.

19 DATED: October 16, 2019.

20
21 William G. Cobb
22 THE HONORABLE WILLIAM G. COBB
23 UNITED STATES MAGISTRATE JUDGE
24
25
26
27
28