	1	State Bar No. 33		
	2			
	3	 3 LEWIS ROCA ROTHGERBER CHRISTIE LLP One East Liberty Street, Suite 300 4 Reno, Nevada 89501-2128 Tel: (775) 823-2900 5 E-mail: <u>dmcelhinney@lrrc.com</u> E-mail: <u>kmartini@lrrc.com</u> 		
	4			
	5			
	6			
	7	Attorneys for Defendant/Counterclaimant Ladera Development, LLC		
	8	UNITED STATES DISTRICT COURT		
	9			
suite 300 .8	10			
	11	HALL CA-NV, LLC, a Texas limited liability company,	CASE NO. 3:18-cv-00124-RCJ-VPC	
	12	Plaintiff,		
	13	V.	STIPULATION AND ORDER TO	
treet, 101-212	14	LADERA DEVELOPMENT, LLC, a Nevada	EXTEND TIME TO RESPOND TO HALL CA-NV, LLC'S MOTION TO	
erty St la 895	15	limited liability company,	DISMISS COUNTERCLAIM FOR FAILURE TO STATE A CLAIM (ECF	
One East Liberty Street, Suite 300 IE Reno, Nevada 89501-2128	16	Defendant.	NO. 29)	
	17		(FIRST REQUEST)	
	18	LADERA DEVELOPMENT, LLC, a Nevada limited liability company,		
N Sist	19	Counterclaimant,		
Lewis Roca Rothgerber Christie	20	v.		
	21	HALL CA-NV, LLC, a Texas limited liability company,		
	22	Counterdefendant.		
	23			
	24	Pursuant to Local Rule 6-1, Defendant/Counterclaimant Ladera Development, LLC		
	25	("Ladera"), and Plaintiff/Counterdefendant Hall CA-NV, LLC ("Hall"), by and through their		
	26	undersigned counsel, hereby stipulate and agree to extend the deadline for Ladera to respond		
	27	to Hall's Motion To Dismiss Counterclaim For	Failure to State A Claim ("Motion") (ECF No.	

28 29) filed on July 27, 2018. Ladera's response to Hall's Motion was originally due on August

	1	10, 2018. The parties have agreed to extend Ladera's response time by two days; thus,			
	2	Ladera's new response deadline is Tuesday, August 14, 2018. This is the first request for			
	3	extension of time as regarding Hall's Motion. This request is made for the reasons that			
	4	Ladera's counsel is involved in emergency writ proceedings before the Nevada Supreme Court,			
	5	which on August 8, 2018, directed Ladera's counsel to file a response to an emergency motion			
	6	by Monday, August 13, 2018. This request for a two-day extension of time is made in good			
	7	faith and is not intended to delay the final determination of this matter.			
	8	IT IS SO AGREED AND STIPULATED, this 9th day of August, 2018:			
KOINGERBER CHRISTIE KENO, NEVAGA 89501-2128	 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 	FAHRENDORF, VILORIA, OLIPHANT & OSTER LLP In association with: GARDERE WYNNE SEWELL LLP By: /s/ Nathan J. Aman Nathan J. Aman, Esq. (by pro hac vice) 2021 McKinney Avenue, Suite 1600 Dallas, TX 75201 Brail: naman@renonvlaw.com Image: Comparison of the state of the st			
		105702536 1 2			

Lewis Roco ROTHGERBER CHRISTIE Reno. Nevada 89501-2128