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10 *Supply Chain Services NA, Inc., and Tesla Motors,*
Inc.

11 **UNITED STATES DISTRICT COURT**
12 **FOR THE DISTRICT OF NEVADA**

13 ROBERT THURMAN-SILVA, an individual,
14
15 Plaintiff,

Case No.: 3:19-cv-00683-LRH-WGC

16 vs.

17 **STIPULATION AND ORDER FOR AN**
EXTENSION OF TIME TO RESPOND TO
18 **PLAINTIFF'S FIRST AMENDED**
COMPLAINT
19 **(THIRD REQUEST)**

17 EMPLOYBRIDGE SOUTHWEST, LLC d/b/a
PROLOGISTIX, a Foreign Limited-Liability
18 Company; THYSSENKRUPP MATERIALS
NA, INC.; a Foreign Corporation;
19 THYSSENKRUPP SUPPLY CHAIN
SERVICES NA, INC., a Foreign Corporation;
20 and, TESLA MOTORS, INC., a Foreign
Corporation; DOE BUSINESS ENTITIES 1-
21 10; DOE INDIVIDUALS 1-10,
22 Defendants.

23 Pursuant to LR IA 6-1, LR IA 6-2 and LR 7-1, Plaintiff Robert Thurman-Silva (“Plaintiff”)
24 and Defendants Thyssenkrupp Materials NA, Inc., Thyssenkrupp Supply Chain Services NA, Inc.,
25 (collectively, “Thyssenkrupp”), Tesla Motors, Inc. (“Tesla”), by and through their respective counsel
26 of record, hereby request and stipulate to extend the time for Defendants to respond to Plaintiff’s
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28

1 First Amended Complaint (ECF No. 2).¹ Defendants' responses to the First Amended Complaint
2 are currently due March 19, 2020; however, given the COVID-19 Pandemic, Defendants request an
3 extension of time up to and including March 30, 2020 in which to respond. This is the parties' third
4 request for an extension of time.

5 This Stipulation is made in good faith and is not intended for purposes of delay.

6 DATED this 19th day of March, 2020.

DATED this 19th day of March, 2020.

7 THE GEDDES LAW FIRM, P.C.

OGLETREE, DEAKINS, NASH, SMOAK & STEWART,
8 P.C.

9 /s/ Kristen R. Geddes

/s/ Dana B. Salmonson

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Attorneys for Defendants
Thyssenkrupp Materials NA, Inc.,
Thyssenkrupp Supply Chain Services NA, Inc.,
and Tesla Motors, Inc.

ORDER

17
18 IT IS SO ORDERED.

19
20 William G. Cobb
U.S MAGISTRATE JUDGE

21
22 March 20, 2020
DATED

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28 ¹ At this time, Plaintiff intends for this extension to apply to all Defendants, including Employbridge Southwest, LLC d/b/a Prologistix. Thyssenkrupp and Tesla were amidst finalizing representation for Employbridge; however, all parties' internal resources have been impacted by COVID-19 and, unfortunately, have prevented the parties from finalizing representation.