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13 Parts International, Inc., Harry
14 Niwranski, and Anthony Magnotta*

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17 **UNITED STATES DISTRICT COURT**
18 **DISTRICT OF NEVADA**

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13 ERICA BARROW, an individual

14 Plaintiff,

15 v.

16 HELICOPTER PARTS INTERNATIONAL,
17 INC., a Nevada Corporation; HARRY
18 NIWRANSKI, an individual; ANTHONY
19 MAGNOTTA; DOES I through X, Inclusive;
and ROE CORPORATIONS I through X,
inclusive,

20 Defendants.

21 CASE NO.: 3:20-cv-00528-MMD-CLB

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23 **STIPULATION AND [PROPOSED]**
24 **ORDER TO EXTEND DEADLINE FOR**
25 **DEFENDANT TO FILE A REPLY IN**
26 **SUPPORT OF DEFENDANTS' MOTION**
27 **TO DISMISS FIRST AMENDED**
28 **COMPLAINT PURSUANT TO FRCP**
12(b)(6)

(Second Request)

29 Plaintiff Erica Barrow ("Barrow") and Defendants Helicopter Parts International, Inc.
30 ("HPI"), Harry Niwranski ("Niwranski"), and Anthony Magnotta ("Magnotta") (collectively, when
31 possible, "Defendants"), by and through their respective counsel, hereby submit the following
32 Stipulation and [Proposed] Order to Extend Deadline for Defendant to file a Reply in Support of
33 Defendants' Motion to Dismiss First Amended Complaint Pursuant to FRCP 12(b)(6). Defendants
34 seek a one-week extension to file their Reply. The parties previously stipulated to a two-week
35 extension to file this reply in light of defense counsel's schedule and the holiday season. This
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1 request is made in good faith to accommodate the associate attorney on the case as he has fallen ill
2 and is unable to work, and is not made for the purpose of delay, and will not result in any undue
3 delay or prejudice. Accordingly, the Parties have agreed and stipulate that the deadline for the
4 Defendants to file their Reply in Support of Defendants' Motion to Dismiss First Amended
5 Complaint Pursuant to FRCP 12(b)(6) will be on or before January 13, 2021.

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7 DATED this 6th day of January, 2021.

8 BY: /s/ Matthew C. Piccolo
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14 *Attorneys for Plaintiff*

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DATED this 6th day of January, 2021.

BY: /s/ Jonathan A. McGuire
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Attorneys for Defendants

IT IS SO ORDERED:

Dated: January 7, 2021.


UNITED STATES DISTRICT JUDGE

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