

SIMONS HALL JOHNSTON PC  
6490 S. McCarran Blvd., Ste. F-46  
Reno, NV 89509  
Phone: (775) 785-0088

1 ANTHONY L. HALL, ESQ.  
Nevada Bar No. 5977  
2 [AHall@SHJNevada.com](mailto:AHall@SHJNevada.com)  
JONATHAN A. MCGUIRE, ESQ.  
3 Nevada Bar No. 15280  
[JMcGuire@SHJNevada.com](mailto:JMcGuire@SHJNevada.com)  
4 SIMONS HALL JOHNSTON PC  
6490 S. McCarran Blvd., Ste. F-46  
5 Reno, Nevada 89509  
Telephone: (775) 785-0088  
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7 *Attorneys for Defendants Helicopter*  
*Parts International, Inc., Harry*  
*Niwranski, and Anthony Magnotta*  
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12 UNITED STATES DISTRICT COURT  
13 DISTRICT OF NEVADA

14 ERICA BARROW, an individual  
15  
Plaintiff,  
16  
v.  
17 HELICOPTER PARTS INTERNATIONAL,  
INC., a Nevada Corporation; HARRY  
18 NIWRANSKI, an individual; ANTHONY  
MAGNOTTA; DOES I through X, Inclusive;  
19 and ROE CORPORATIONS I through X,  
inclusive,  
20  
Defendants.

CASE NO.: 3:20-cv-00528-MMD-CLB  
  
**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND DEADLINE FOR  
DEFENDANT TO FILE A REPLY IN  
SUPPORT OF DEFENDANTS’ MOTION  
TO DISMISS FIRST AMENDED  
COMPLAINT PURSUANT TO FRCP  
12(b)(6)**  
  
**(Second Request)**

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22 Plaintiff Erica Barrow (“Barrow”) and Defendants Helicopter Parts International, Inc.  
23 (“HPI”), Harry Niwranski (“Niwranski”), and Anthony Magnotta (“Magnotta”) (collectively, when  
24 possible, “Defendants”), by and through their respective counsel, hereby submit the following  
25 Stipulation and [Proposed] Order to Extend Deadline for Defendant to file a Reply in Support of  
26 Defendants’ Motion to Dismiss First Amended Complaint Pursuant to FRCP 12(b)(6). Defendants  
27 seek a one-week extension to file their Reply. The parties previously stipulated to a two-week  
28 extension to file this reply in light of defense counsel’s schedule and the holiday season. This

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.

6  
7 DATED this 6<sup>th</sup> day of January, 2021.

DATED this 6<sup>th</sup> day of January, 2021.

8 BY: /s/ Matthew C. Piccolo  
9 PICCOLO LAW OFFICES  
10 8565 S Eastern Ave Ste 150  
11 Las Vegas, NV 89123  
(702) 630-5030  
matt@piccololawoffices.com

12 *Attorneys for Plaintiff*

BY: /s/ Jonathan A. McGuire  
ANTHONY L. HALL, ESQ.  
Nevada Bar No. 5977  
JONATHAN A. MCGUIRE, Esq.  
Nevada Bar No. 15280  
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13 *Attorneys for Defendants*

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16 **IT IS SO ORDERED:**

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18 Dated: January 7, 2021.

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22 UNITED STATES DISTRICT JUDGE  
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