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 6 JUAN ULLOA,  
 Plaintiff,  
 7  
 8 vs.  
 9 NEVADA GOLD MINES, a Delaware  
 Limited Liability Company,  
 10 Defendant.

CASE NO.: 3:21-cv-495-RCJ-CSD

**STIPULATION AND ORDER TO  
 EXTEND PLAINTIFF’S TIME TO  
 RESPOND TO DEFENDANT’S MOTION  
 FOR ENLARGEMENT OF TIME TO  
 RESPOND TO REQUESTS FOR  
 ADMISSIONS OR ALTERNATIVELY TO  
 WITHDRAW ADMISSIONS PURSUANT  
 TO FRCP 36(b) (ECF NO. 40)**

**(FIRST REQUEST)**

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 12 Defendant, Nevada Gold Mines, LLC (“Defendant” or “NGM”), by and through its  
 13 counsel of record, ANTHONY HALL and JONATHAN MCGUIRE of SIMONS HALL  
 14 JOHNSTON, and Plaintiff Juan Ulloa, (“Plaintiff”) by and through his counsel of record, J.P.  
 15 KEMP of KEMP & KEMP, hereby stipulate and agree to extend the deadline for Plaintiff to file  
 16 his Response to NGM’s Motion (ECF No. 40) that seeks an enlargement of time to respond to  
 17 Requests for Admissions or alternatively to withdraw admissions pursuant to FRCP Rule 36(b).  
 18 The response, currently due on July 29, 2022, will be extended by two (2) weeks to and  
 19 including **August 12, 2022.**

20 The reason for the extension, as Plaintiff’s counsel has informed Defense Counsel is that  
 21 Plaintiff’s counsel had another significant briefing deadline due on July 29, 2022 and in the two  
 22 weeks since Defendant’s motion was filed Plaintiff’s counsel has been tied up preparing for two  
 23 party Rule 30(b)(6) depositions and a significant workers’ compensation appeal hearing. Also,  
 24 Plaintiff’s counsel was out of the country on vacation until July 20, 2022 when he returned to  
 25 the office. More time is needed to address the matters set forth in Defenant’s motion.

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This is the parties first request for an extension of time for Plaintiff to respond to Defendant’s motion (ECF No. 40) and is made in good faith and not for the purpose of delay.

DATED: July 29, 2022

DATED: July 29, 2022

KEMP & KEMP

SIMONS HALL JOHNSTON PC

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**ORDER**

**IT IS SO ORDERED.**

Dated: August 1, 2022



UNITED STATES MAGISTRATE JUDGE