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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

FEDERAL TRADE COMMISSION, Plaintiff, v. OMICS GROUP INC., et al., Defendants.	Case No. 2:16-cv-02022-GMN-VCF STIPULATION AND [PROPOSED] ORDER TO EXTEND RESPONSE DEADLINE

Defendants, OMICS GROUP INC., IMEDPUB LLC, CONFERENCE SERIES LLC, and SRINUBABU GEDELA, by and through counsel of record, D. Neal Tomlinson and Kristina R. Kleist, and Plaintiff, FEDERAL TRADE COMMISSION, by and through counsel of record, Gregory A. Ashe and Michael E. Tankersley, hereby agree and stipulate as follows:

1. On May 1, 2018, Plaintiff filed its Motion to for Summary Judgment, (Dkt. No. 86).
2. Defendants also filed their Motion for Summary Judgment on May 1, 2018 (Dkt. No. 89).
3. Plaintiff's Motion for Summary Judgment is quite extensive, being over 50 pages itself and referencing 27 exhibits, including a declaration with exhibits of over 1,000 pages.
4. Plaintiff filed their Opposition to Defendants' Motion for Summary Judgment on May 22, 2018 (Dkt. No. 97).

5. Plaintiff also filed a Motion to Strike the Declaration of Kishore Vattikoti, part of Defendants' Motion for Summary Judgment, on May 22, 2018 (Dkt. No. 96).
6. This Court granted a stipulation for extension of time for the parties to respond to the respective Motions for Summary Judgment (Dkt. No. 98).
7. The parties filed a second stipulation for extension of time to respond to the respective Motions for Summary Judgment to June 8, 2018 (Dkt. No. 99).
8. Currently, pursuant to stipulation, responses to the Motions for Summary Judgment are due on June 8, 2018 and Defendants' response to the Motion to Strike the Declaration of Kishore Vattikoti is due on June 8, 2018.
9. Additionally, because Plaintiff has already filed their Opposition to Defendants' Motion for Summary Judgment, Defendants' Reply is due June 8, 2018.
10. Defense counsel has been dealing with multiple family medical issues that have required counsel to be out of the office, and additional time is needed to confer with Defendants and respond to the pending filings.
11. In addition, additional time is necessary due to the fact that all Defendants are located in India, and that language, time zones and geographical barriers have presented significant challenges in that defense counsel has encountered difficulty explaining and communicating with the Defendants regarding the many issues and complexities of the pending motions.
12. Plaintiff's counsel has agreed to extend the June 8, 2018 response date to the Motion for Summary Judgment and the June 8, 2018 response date for the Motion to Strike and the Reply to Plaintiff's Opposition to Defendants' Motion for Summary Judgment to June 22, 2018.

13. This Stipulation is being made in good faith between and at the request of both parties, and not for purposes of delay.

HYPERION ADVISORS

Dated this 7th day of June, 2018.

/s/ *D. Neal Tomlinson*

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FEDERAL TRADE COMMISSION

Dated this 7th day of June, 2018.

/s/ *Gregory A. Ashe*

ALDEN F. ABBOTT
General Counsel
GREGORY A. ASHE
MICHAEL E. TANKERSLEY
Federal Trade Commission
600 Pennsylvania Avenue NW
Washington, DC 20850

Attorneys for Plaintiff

ORDER

Pursuant to the stipulation of the parties, the deadline for Defendants to file their response to Plaintiff's Motion for Summary Judgment, their reply to Plaintiff's Opposition to Defendants' Motion for Summary Judgment, and their response to Plaintiff's Motion to Strike is hereby extended to June 22, 2018.

IT IS SO ORDERED.

Dated this 20 day of June, 2018.

Gloria M. Navarro, Chief Judge
UNITED STATES DISTRICT COURT

Respectfully submitted by:

HYPERION ADVISORS

/s/ *D. Neal Tomlinson*

D. NEAL TOMLINSON
Nevada Bar No. 06851
KRISTINA KLEIST
Nevada Bar No. 13520
Attorneys for Defendants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 7, 2018, a true and correct copy of the foregoing **STIPULATION AND [PROPOSED] ORDER TO EXTEND RESPONSE DEADLINE** was filed electronically with the United States District Court for the District of Nevada using the CM/ECF system, which sent notification to all parties of interest participating in the CM/ECF system.

/s/ *D. Neal Tomlinson*
Attorney for Defendants