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IN THE UNITED STATES DISTRICT COURT

DISTRICT OF UTAH

BAM FRANCHISING, INC., AMMON
MCNEFF, MATTHEW MCNEFF, JOSH
JOHNSON, BRANDON BEST, BAKER
BRICKS, LLC, dba SALEM-BAKER
BRICKS, INC.,

Plaintiffs,

vs.

BENJAMIN PAUL SCHNEIDER,
RECKLESS BEN LLC, BRYAN MANSELL,
and VICTOR NGUYEN,

Defendants.

**STIPULATED AND JOINT MOTION TO
TOLL DEADLINE TO FILE SPECIAL
MOTION FOR EXPEDITED RELIEF**

Case No. 2:26cv593

Judge David Barlow

Pursuant to Rule 6(b), Local Rule DUCivR 7-1(a), and Utah Code § 78B-25-101 *et seq.*, the Parties, by and through their undersigned counsel, stipulate and respectfully jointly move the Court to extend the deadline to file a special motion for expedited relief under Utah Code § 78B-25-103 until Friday, September 18, 2026. The Parties are engaged in settlement negotiations and

agree that good cause exists pursuant to Utah Code § 78B-25-103 to extend this deadline. Specifically, Plaintiffs recently resolved their claim against Defendant Mansell, and they are meeting with the mediator today (September 1, 2026) to consider and respond to an offer from the remaining defendants. The Parties jointly request additional time to see if the matter can be fully and finally resolved before moving forward with litigation. Accordingly, the Parties respectfully request that the deadline to file a special motion for expedited relief be extended to September 18, 2026.

A proposed order is filed concurrently.

DATED this 1st day of September, 2026.

SPENCER FANE LLP

/s/ Scott Young

R. Scott Young

Melinda K. Bowen

Hailey Winn

*Attorneys for Defendants Benjamin Paul Schneider,
Reckless Ben LLC, and Victor Nguyen*

DENTONS DURHAM JONES PINEGAR, PC

/s/ Justin T. Rich (Signed with permission)

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Attorneys for Defendant Bryan Mansell

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of September, 2026, I electronically filed the foregoing
**STIPULATED AND JOINT MOTION TO TOLL DEADLINE TO FILE SPECIAL
MOTION FOR EXPEDITED RELIEF** with the Clerk of the Court using the CM/ECF System:

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**UNITED STATES DISTRICT COURT
DISTRICT OF UTAH**

BAM FRANCHISING, INC., AMMON
MCNEFF, MATTHEW MCNEFF, JOSH
JOHNSON, BRANDON BEST, BAKER
BRICKS, LLC, dba SALEM-BAKER
BRICKS, INC.,

Plaintiffs,

vs.

BENJAMIN PAUL SCHNEIDER,
RECKLESS BEN LLC, BRYAN MANSELL,
and VICTOR NGUYEN,

Defendants.

**ORDER TO TOLL DEADLINE TO FILE
SPECIAL MOTION FOR EXPEDITED
RELIEF**

Case No. 2:26cv593

Judge David Barlow

Magistrate Judge Cecilia M. Romero

Based on the Parties' Stipulated and Joint Motion to Toll Deadline to File Special Motion for Expedited Relief, and for good cause shown, the Court finds there is good cause to extend the deadline to file a Special Motion for Expedited Relief. Therefore, the Court hereby GRANTS the motion and extends the deadline to file a special motion for expedited relief to September 18, 2026.

SO ORDERED this ____ day of September, 2026.

BY THE COURT:

Honorable Cecilia M. Romero