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8 *Attorneys for Defendants HUMBL, Inc.*  
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10 *And Michele Rivera*

11 **UNITED STATES DISTRICT COURT**  
12 **SOUTHERN DISTRICT OF CALIFORNIA**

13 MATT PASQUINELLI and BRYAN  
14 PAYSAN, Individually and on Behalf of  
15 All Others Similarly Situated,

16 Plaintiffs,

17 v.

18 HUMBL, LLC, BRIAN FOOTE,  
19 JEFFREY HINSHAW, GEORGE  
20 SHARP, KAREN GARCIA, and  
21 MICHELE RIVERA,

22 Defendants.

Case No.: 3:22-cv-00723-AJB-BLM

**STIPULATION EXTENDING  
BRIEFING SCHEDULES**

Judge: Hon. Anthony Battaglia  
Courtroom.: 4A

Complaint Filed: May 19, 2022  
Trial: Not yet set

23 Co-Lead Plaintiffs Matt Pasquinelli and Alfred Miller (“Plaintiffs”), together with  
24 Defendants HUMBL, Inc.,<sup>1</sup> Brian Foote, Jeffrey Hinshaw, Karen Garcia, Michele Rivera  
25 (the preceding Defendants, the “HUMBL Defendants”), and Defendant George Sharp  
26 (“Defendant Sharp”) (collectively, the “Parties”), by and through their attorneys of record,  
27 hereby jointly move for an order (1) extending the time for the HUMBL Defendants’ Reply  
28 brief in further support of their Motion to Transfer Venue (the “Motion to Transfer”) and  
(2) extending the time for Plaintiff’s response and Defendant Sharp’s Reply as to

<sup>1</sup> As noted in its prior filings, HUMBL, Inc. believes that it was erroneously sued as “HUMBL, LLC.”

1 Defendant Sharp’s Motion to Dismiss the First Amended Class Action Complaint (the  
2 “Motion to Dismiss”); and hereby stipulate as follows:

3 WHEREAS, on October 21, 2022, the HUMBL Defendants filed their Motion to  
4 Transfer (ECF No. 31);

5 WHEREAS, on October 24, 2022, the Court set a briefing schedule for the Motion  
6 to Transfer, pursuant to which responses were due by November 7, 2022 and replies are  
7 due by November 14, 2022, with a hearing scheduled for February 2, 2023 (ECF No. 32);

8 WHEREAS, on October 27, 2022, Defendant Sharp filed his Motion to Dismiss  
9 (ECF No. 33);

10 WHEREAS, on October 28, 2022, the Court set a briefing schedule for the Motion  
11 to Dismiss, pursuant to which responses are due by November 14, 2022 and replies are due  
12 by November 21, 2022, with a hearing scheduled for February 2, 2023 (ECF No. 36);

13 WHEREAS, on November 7, 2022, Plaintiffs filed their response to the Motion to  
14 Transfer Venue (ECF No. 38);

15 WHEREAS, counsel for the HUMBL Defendants have requested, and counsel for  
16 the Plaintiffs have consented to, a seven-day extension of time for the HUMBL Defendants  
17 to file their Reply brief in further support of their Motion to Transfer;

18 WHEREAS, counsel for Plaintiffs have requested, and counsel for Defendant Sharp  
19 has consented to, a seven-day extension of time for Plaintiffs to file their response to  
20 Defendant Sharp’s Motion to Dismiss; and

21 WHEREAS, good cause exists for the requested extensions above, to allow  
22 sufficient time for the Parties to prepare responses to the arguments in the briefs submitted  
23 by opposing counsel, and consistent with their counsel’s schedules;

24 NOW, THEREFORE, the Parties, by and through their attorneys of record, hereby  
25 stipulate to, and jointly move for the entry of the Proposed Order adopting, the following  
26 extensions to the briefing schedule for the Motion to Transfer and the Motion to Dismiss:

27 ///

28 ///

- 1 • The HUMBL Defendants’ Reply in further support of their Motion to Transfer
- 2 shall due by November 21, 2022;
- 3 • Plaintiff’s response to Defendant Sharp’s Motion to Dismiss shall be due by
- 4 November 21, 2022; and
- 5 • Defendant Sharp’s Reply in support of his Motion to Dismiss shall be due by
- 6 December 1, 2022.

7  
8 Dated: November 11, 2022

Respectfully submitted,

9 **SCOTT+SCOTT**  
10 **ATTORNEYS AT LAW LLP**

11 /s/ John T. Jasnoch (with permission)

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18 *Co-Lead Counsel for Plaintiffs*

19  
20 Dated: November 11, 2022

21 **ROCHE FREEDMAN LLP**

22 /s/ Ivy T. Ngo (with permission)

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*Co-Lead Counsel for Plaintiffs*

Dated: November 11, 2022

**DINSMORE & SHOHL LLP**

/s/ Joseph S. Leventhal

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*/s/ Joseph Dankert (with permission)*

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**ATTESTATION OF ELECTRONIC SIGNATURES**

I, Joseph S. Leventhal, attest that all signatories listed, and on whose behalf this filing is submitted, concur in the filing’s content and have authorized the filing of this Stipulation and Proposed Order Extending Briefing Schedules.

Dated: November 11, 2022

*/s/ Joseph S. Leventhal*

Joseph S. Leventhal