

1 Mark A. Hutchison (Nev. Bar No. 4639)
Joseph C. Reynolds (Nev. Bar No. 8630)
2 HUTCHISON & STEFFEN, PLLC
3 100 West Liberty Street, Suite 765
Reno, Nevada 89501
4 mhutchison@hutchlegal.com
5 jreynolds@hutchlegal.com
(775) 853-8746
6 (*designated local counsel*)

Orin Snyder
(*pro hac vice*)
Matthew Benjamin
(*pro hac vice*)
GIBSON, DUNN & CRUTCHER LLP
200 Park Avenue
New York, New York 10166
OSnyder@gibsondunn.com
MBenjamin@gibsondunn.com
(212) 351-4000

7
8 Adam P. Laxalt (Nev. Bar No. 12426)
COOPER & KIRK, PLLC
9 1523 New Hampshire Avenue NW
Washington, D.C. 20036
10 alaxalt@cooperkirk.com
11 (202) 220-9600

Thomas H. Dupree Jr.
(*pro hac vice*)
Jacob T. Spencer
(*pro hac vice*)
Adam I. Steene
(*pro hac vice*)
GIBSON, DUNN & CRUTCHER LLP
1700 M Street NW
Washington, D.C. 20036
TDupree@gibsondunn.com
JSpencer@gibsondunn.com
ASteene@gibsondunn.com
(202) 955-8500

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16 Counsel for Defendants BLOCKRATIZE INC.
d/b/a Polymarket; QCX LLC d/b/a Polymarket US;
17 and ADVENTURE ONE QSS INC. d/b/a Polymarket

18 UNITED STATES DISTRICT COURT
19 DISTRICT OF NEVADA

20 STATE OF NEVADA ex rel. NEVADA
21 GAMING CONTROL BOARD,

22 Plaintiffs,

23 v.

24 BLOCKRATIZE INC. d/b/a Polymarket; QCX
25 LLC d/b/a Polymarket US; ADVENTURE
26 ONE QSS INC. d/b/a Polymarket,

27 Defendants.
28

Case No.: 3:26-cv-00089-MMD-CLB

[Nev. Dist. Ct. No. 26OC000121B]

DEFENDANTS' EMERGENCY MOTION
FOR ADMINISTRATIVE STAY

MOTION FOR ADMINISTRATIVE STAY

1
2 Defendants Blockratize Inc. d/b/a Polymarket, QCX LLC d/b/a Polymarket US, and
3 Adventure One QSS Inc. d/b/a Polymarket submit this motion to request a brief administrative
4 stay of the Court’s remand order pending the Court’s resolution of Defendants’ forthcoming
5 motion for a stay pending appeal to the Ninth Circuit.¹

6 Today, the Court ordered that this case be remanded to state court, concluding that it
7 lacks jurisdiction under 28 U.S.C. § 1442(a) and 28 U.S.C. § 1331. Because Defendants
8 “removed pursuant to section 1442,” Defendants have a statutory right under 28 U.S.C.
9 § 1447(d) to appeal the order, and they intend to exercise that right promptly.

10 To ensure “that [their] right to appeal will” remain “meaningful,” Defendants also intend
11 in the next 24 hours to file a motion with this Court requesting a stay of the Court’s remand order
12 pending appeal. *Oracle Int’l Corp. v. Rimini St., Inc.*, 2023 WL 5221947, at *5 (D. Nev. Aug.
13 15, 2023) (Du, C.J.).

14 In the meantime, Defendants respectfully request that the Court enter a brief
15 administrative stay. *See Oracle*, 2023 WL 5221947, at *6 (granting such a stay). An
16 administrative stay would allow the Court adequate time to consider the motion and any
17 response. And it would prevent any jurisdictional confusion that might result if the remand order
18 were mailed to state court before resolution of the stay motion. *See Acad. of Country Music v.*
19 *Cont’l Cas. Co.*, 991 F.3d 1059, 1070 (9th Cir. 2021) (directing the district court to “enter an
20 order recalling the remand” and to notify the state court “that the district court has resumed
21 jurisdiction over” improperly remanded action). Even if remaining in federal court could
22 somehow harm Plaintiff—it would not—this Court has previously held that “the marginal delay
23 associated with the time it takes” for a court to resolve a “motion to stay . . . will not cause much
24 additional harm.” *Oracle*, 2023 WL 5221947, at *5; *see, e.g., Apple Inc. v. Samsung Elecs. Co.*,
25 2015 WL 13711858, at *1 (N.D. Cal. Apr. 7, 2015) (similar). An administrative stay is therefore
26

27 ¹ This motion is not—and should not be construed as—a general appearance or appearance on
28 the merits by Defendants. By filing this motion, Defendants do not waive any defenses, whether
in state or federal court, including, without limitation, improper service of process or lack of
personal jurisdiction.

1 warranted.

2 The Court should administratively stay its remand order pending the Court's resolution
3 of Defendants' forthcoming motion for a stay pending appeal.

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1 DATED: March 2, 2026.

2 HUTCHISON & STEFFEN, PLLC

3 /s/ Joseph C. Reynolds

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5 Mark A. Hutchison (Nev. Bar No. 4639)
6 Joseph C. Reynolds (Nev. Bar No. 8630)
7 100 West Liberty Street, Suite 765
8 Reno, Nevada 89501
9 mhutchison@hutchlegal.com
10 jreynolds@hutchlegal.com
11 (775) 853-8746

12 Adam P. Laxalt (Nev. Bar No. 12426)
13 COOPER & KIRK, PLLC
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16 alaxalt@cooperkirk.com
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20 GIBSON, DUNN & CRUTCHER LLP
21 200 Park Avenue
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23 OSnyder@gibsondunn.com
24 MBenjamin@gibsondunn.com
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TDupree@gibsondunn.com
JSpencer@gibsondunn.com
ASteene@gibsondunn.com
(202) 955-8500

*Counsel for Defendants BLOCKRATIZE INC.
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CERTIFICATE OF SERVICE

I hereby certify that I caused a copy of DEFENDANTS’ EMERGENCY MOTION FOR ADMINISTRATIVE STAY to be electronically filed and served on all counsel of record using the Court’s CM/ECF system.

DATED: March 2, 2026.

By: /s/ Madelyn Carnate-Peralta
An Employee of Hutchison & Steffen, PLLC