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 9 601 South Seventh Street  
 10 Las Vegas, NV 89101  
 11 Tel: (702) 387-8633  
 12 Fax: (702) 387-8635

13 Attorneys for NAPHCARE, INC. an Alabama Corporation; HARRY DURAN, M.D., in his  
 14 individual capacity; ERIC LOPEZ, P.A., in his individual capacity; RACHEL SCHEIBLICH  
 15 (formerly known as "RUDD") in her individual capacity; KENDRA MEYER (formerly known  
 16 as "SCHULTZ") in her individual capacity and RAYMOND MONDORA

17 UNITED STATES DISTRICT COURT  
 18 DISTRICT OF NEVADA

19 JUSTIN L. TRIPP,

20 Plaintiff,

21 vs.

22 CLARK COUNTY, LAS VEGAS POLICE  
 23 DEPARTMENT, OFFICER J. TORRES,  
 24 OFFICER M. ROSE, JOHN DOE #1,  
 25 NAPHCARE, INC., et al.

26 Defendants.

Case No.: 2:17-cv-01964-JCM-BNW

**STIPULATION AND [PROPOSED]  
 ORDER TO EXTEND DISPOSITIVE  
 MOTION DEADLINE**

27 Pursuant to LR7-1 and LR 26-3, the parties, by and through their respective counsel of  
 28 record, hereby stipulate and request this Court extend the dispositive motion deadline in the  
 above captioned case for ninety (90) days.

///



**E. PROPOSED SCHEDULE FOR COMPLETING ALL REMAINING DISCOVERY**

- 1. Close of Discovery: Closed
- 2. Last Day to Amend Pleadings and Add Parties: Closed
- 3. Initial Expert Designation: Closed
- 4. Rebuttal Expert Designation: Closed
- 5. Last Day for Dispositive Motions: March 26, 2021
- 6. Pretrial Order April 26, 2021

For the foregoing reasons, the parties respectfully request that the Court enter an Order adopting the 90-day extension for dispositive motions set forth in this Stipulation.

Dated: December 4, 2020

Dated: December 4, 2020

**KAEMPFER CROWELL**

**LAURIA TOKUNAGA GATES & LINN, LLP**

*/s/ Lyssa Anderson, Esq.*

*/s/ Paul A. Cardinale, Esq.*

By: \_\_\_\_\_

By: \_\_\_\_\_

Lyssa Anderson, Esq.  
Ryan Daniels, Esq.  
Attorney for Defendant  
*Las Vegas Metro PD*

Paul A. Cardinale, Esq.  
Attorney for Defendants  
*NAPHCARE, INC. an Alabama Corporation;*  
*HARRY DURAN, M.D., in his individual*  
*capacity; ERIC LOPEZ, P.A., in his individual*  
*capacity; RACHEL SCHEIBLICH (formerly*  
*known as "RUDD") in her individual*  
*capacity; KENDRA MEYER (formerly known*  
*as "SCHULTZ") in her individual capacity*  
*and RAYMOND MONDORA*

Dated: December 4, 2020

Dated: December 4, 2020

**HATFIELD & ASSOCIATES, LTD.**

**DEPUTY DISTRICT ATTORNEY – CIVIL**

*/s/ Trevor J. Hatfield, Esq*

*/s/ Jeffrey S. Rogan, Esq.*

By: \_\_\_\_\_

By: \_\_\_\_\_

Trevor J. Hatfield, Esq.  
Ryan Daniels, Esq.  
Attorney for Plaintiff  
*Justin L. Tripp*

Steven B. Wolfson, Esq.  
Jeffrey S. Rogan, Esq.  
Attorney for Defendant  
*Clark County*

**ORDER**

**IT IS SO ORDERED** that the instant Stipulation to Extend Dispositive Motion Deadline is **GRANTED** and the discovery deadlines shall be amended as follows:

Close of Discovery:	<i>Closed</i>
Last Day to Amend Pleadings and Add Parties:	<i>Closed</i>
Initial Expert Designation:	<i>Closed</i>
Rebuttal Expert Designation:	<i>Closed</i>
Last Day for Dispositive Motions:	March 26, 2021
Joint Pre-Trial Order	April 26, 2021

**IT IS SO ORDERED**

**DATED:** 10:09 am, December 08, 2020



**BRENDA WEKSLER**  
**UNITED STATES MAGISTRATE JUDGE**

**Liesa M. Costa**

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**From:** Lyssa Anderson <landerson@kcnvlaw.com>  
**Sent:** Friday, December 4, 2020 4:49 PM  
**To:** Jeffrey Rogan  
**Cc:** Paul A. Cardinale; Freda Brazier; Trevor Hatfield; Liesa M. Costa  
**Subject:** Re: Justin Tripp v. Clark County, et al, Case No. 2:17-cv-01964-JCM-BNW

You may add mine as well.

Best Regards,  
Lyssa S. Anderson

On Dec 4, 2020, at 4:21 PM, Jeffrey Rogan <Jeffrey.Rogan@clarkcountyda.com> wrote:

Paul,

You can attach my e-signature to the Stipulation.

Jeff

---

**From:** Paul A. Cardinale <pcardinale@ltglaw.net>  
**Sent:** Friday, December 4, 2020 4:01:35 PM  
**To:** Freda Brazier <freda@hatfieldlawassociates.com>; Lyssa Anderson <landerson@kcnvlaw.com>; Jeffrey Rogan <Jeffrey.Rogan@clarkcountyda.com>; Trevor Hatfield <thatfield@hatfieldlawassociates.com>  
**Cc:** Liesa M. Costa <lcosta@ltglaw.net>  
**Subject:** FW: Justin Tripp v. Clark County, et al, Case No. 2:17-cv-01964-JCM-BNW

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My apologies here is the revised one which includes a signature line for Jeff.

<image001.jpg>

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**Liesa M. Costa**

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**From:** Trevor Hatfield <thatfield@hatfieldlawassociates.com>  
**Sent:** Friday, December 4, 2020 4:13 PM  
**To:** Paul A. Cardinale  
**Cc:** Freda Brazier; Lyssa Anderson; jeffrey.rogan@clarkcountyda.com; Liesa M. Costa  
**Subject:** Re: FW: Justin Tripp v. Clark County, et al, Case No. 2:17-cv-01964-JCM-BNW

Yes, I approve. You can e-sign for me. In re: DPSO, ordinarily the Discovery Orders for these cases are exempt from discovery plans so i just don't know why there is this deadline. Maybe due to an added party?

Trevor J. Hatfield, Esq.,  
HATFIELD & ASSOCIATES, LTD.  
703 S. Eighth St.  
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(702) 388-4469  
[thatfield@hatfieldlawassociates.com](mailto:thatfield@hatfieldlawassociates.com)

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-  
-



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