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Attorneys for Defendant
 7 *Correct Care Solutions, LLC*

8
 9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

12 ROSEN MARIANO, An individual,
 13 Plaintiff,

14 vs.

15 THE CITY OF LAS VEGAS, a political
 subdivision of the State of Nevada,
 16 CORRECTIONAL HEALTHCARE
 COMPANIES, INC., A Foreign Corporation,
 CORRECT CARE SOLUTIONS LLC, A
 17 Foreign Limited Liability Company,
 MICHELLE FREEMAN, Chief of Detention
 18 Enforcement for the City of Las Vegas,
 CORRECTION OFFICER DOE 1-10,
 19 HEALTH CARE WORKER DOES 11-20,
 DOES 21-99 inclusive, ROE
 20 CORPORATIONS 100-199, inclusive,

21 Defendants.

Case No. 2:18-cv-01911-APG-GWF

**STIPULATION TO CONTINUE
 DEFENDANT'S REPLY TO
 PLAINTIFF'S OPPOSITION TO
 DEFENDANT'S MOTION FOR
 SUMMARY JUDGMENT [DOC 51 and
 Doc 55]**

22
 23 The parties, by and through their respective counsel of record, hereby stipulate and
 24 request that this Court extend the deadline for Defendant to file their respective Reply to
 25 Plaintiff's Oppositions to Defendant's Motions for Summary Judgment (Doc 51 and Doc
 26 55) in the above captioned case, up to and including January 11, 2021.

27 This request for an extension of time is not sought for any improper purpose or
 28 other purpose of delay.

1 Wherefore, the parties respectfully request that this Court extend the time for
2 Defendant to file its Reply to Plaintiff’s Oppositions to Defendant’s Motion for Summary
3 Judgment (Doc 51 and Doc 55), up to and including January 11, 2021.

4 DATED: December _____, 2020

DATED: December _____, 2020

5 THE GALLIHER LAW FIRM

LEWIS BRISBOIS BISGAARD & SMITH
6 LLP

7 */s/ Keith E. Galliher, Jr.*

/s/ John M. Orr

8 KEITH E. GALLIHER, JR., ESQ.
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10 1850 E. Sahara Avenue, Suite 107
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12 *Attorneys for Plaintiffs*

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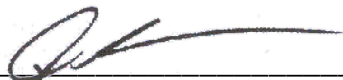
13 DATED: December _____, 2020

14
15 */s/ John A. Curtas*

16 BRADFORD R. JERBIC, ESQ.
17 Nevada Bar No. 1056
18 JOHN A. CURTAS
19 Nevada Bar No. 1841
20 495 S. Main Street, Sixth Floor
21 Las Vegas, Nevada 89101
22 *Attorneys for City of Las Vegas
and Michele Freeman*

23 **IT IS SO ORDERED**

24 DATED: December 2, 2020

25
26 
27 _____
28 UNITED STATES DISTRICT JUDGE

Rokni, Roya

From: John A. Curtas <jacurtas@LasVegasNevada.GOV>
Sent: Wednesday, December 2, 2020 9:53 AM
To: Orr, John; Keith Galliher; Kathleen Gallagher
Cc: Cindy Kelly; Rokni, Roya
Subject: [EXT] RE: CCS adv Mariano__Stip to Extend Deadline for Reply

External Email

Fine with me.

John A. Curtas

Deputy City Attorney
City Attorney's Office | Civil Division
702-229-2125 (direct) | 702-528-7454 (cell)
495 South Main Street, Sixth Floor | Las Vegas, NV 89101



lasvegasnevada.gov



From: Orr, John <John.Orr@lewisbrisbois.com>
Sent: Wednesday, December 02, 2020 9:25 AM
To: Keith Galliher <KGalliher@galliherlawfirm.com>; Kathleen Gallagher <KGallagher@galliherlawfirm.com>; John A. Curtas <jacurtas@LasVegasNevada.GOV>
Cc: Cindy Kelly <CKelly@LasVegasNevada.GOV>; Rokni, Roya <Roya.Rokni@lewisbrisbois.com>
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Rokni, Roya

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John M. Orr
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Las Vegas Rainbow
702.693.4352 or x7024352

From: Keith Galliher <KGalliher@galliherlawfirm.com>
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Hi John: It looks fine. You may esign for me.

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Cc: Cindy Kelly <CKelly@LasVegasNevada.GOV>; Rokni, Roya <Roya.Rokni@lewisbrisbois.com>
Subject: CCS adv Mariano__Stip to Extend Deadline for Reply

Good morning everyone

Please review the attached stip and confirm that I may affix your esignature and file. Let me know if you have proposed changes. Thank you.



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