

1 ROBERT W. FREEMAN
 Nevada Bar No. 3062
 2 E-Mail: Robert.Freeman@lewisbrisbois.com
 CHERYL A. GRAMES
 3 Nevada Bar No. 12752
 E-Mail: Cheryl.Grames@lewisbrisbois.com
 4 TARA U. TEEGARDEN
 Nevada Bar No. 15344
 5 Email: Tara.Teegarden@lewisbrisbois.com
 LEWIS BRISBOIS BISGAARD & SMITH LLP
 6 6385 S. Rainbow Boulevard, Suite 600
 Las Vegas, Nevada 89118
 7 702.893.3383
 FAX: 702.893.3789
 8 *Attorneys for Defendant State Farm Mutual
 Automobile Insurance Company*

9
 10 **UNITED STATES DISTRICT COURT**
 11 **DISTRICT OF NEVADA, SOUTHERN DIVISION**

12 ROSE DESIO,
 13
 Plaintiff,
 14
 vs.
 15
 STATE FARM MUTUAL AUTOMOBILE
 16 INSURANCE COMPANY; DOES I-V and
 ROES VI-X, inclusive
 17
 Defendants.
 18

CASE NO. 2:20-cv-1486-APG-NJK
**STIPULATION AND ORDER FOR
 EXTENSION OF TIME TO FILE
 RESPONSE TO PLAINTIFF’S MOTION
 FOR PARTIAL SUMMARY JUDGMENT**

19 DEFENDANT STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY
 20 (“Defendant”), by and through its counsel of record, the law firm of LEWIS BRISBOIS
 21 BISGAARD & SMITH LLP, and PLAINTIFF ROSE DESIO (“Plaintiff”), by and through her
 22 counsel of record, JESSE SBAIH & ASSOCIATES, LTD., hereby stipulate and agree that the
 23 time for Defendant to file its Response to Plaintiff’s Motion for Partial Summary Judgment be
 24 extended as set forth herein. Defendant State Farm’s Response is currently due December 9,
 25 2020. The parties hereby stipulate that the due date for Defendant’s Response be extended to
 26 December 16, 2020.

Reason for Extension

28 Plaintiff’s Motion for Partial Summary Judgment addresses a nuanced issue of law



1 regarding the enforceability of Defendant’s anti-stacking provision in the Nevada Car Policy it
2 issued to Plaintiff. Defendant requires additional time to address Plaintiff’s claims effectively
3 prior to filing its Response. This stipulation is made in good faith and not for the purpose of
4 delay.

5 This is the first extension of time requested for filing Defendant’s Response to Plaintiff’s
6 Motion for Partial Summary Judgment.

7 DATED this 30th day of November, 2020. DATED this 30th day of November, 2020.

8 LEWIS BRISBOIS BISGAARD & SMITH JESSE SBAlH & ASSOCIATES, LTD.

9 /s/ Tara U. Teegarden

10 ROBERT W. FREEMAN
11 Nevada Bar No. 3062
12 CHERYL A. GRAMES
13 Nevada Bar No. 12752
14 TARA U. TEEGARDEN
15 Nevada Bar No. 15344
16 6385 S. Rainbow Boulevard, Suite 600
17 Las Vegas, Nevada 89118
18 Attorneys for Defendant

/s/ Jesse M. Sbañh

JESSE M. SBAlH
Nevada Bar No. 7898
INES OLEVIC-SALEH
Nevada Bar No. 11431
The District at Green Valley Ranch
170 South Green Valley Parkway, Suite 280
Henderson, Nevada 89012
Attorneys for Plaintiff

16 **ORDER**

17 IT IS SO ORDERED.

18 Dated this 1st day of December, 2020.

19 
20 _____
21 U.S. DISTRICT COURT JUDGE

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 30th day of November, 2020, I electronically filed the foregoing **STIPULATION AND ORDER FOR EXTENSION OF TIME TO FILE RESPONSE TO PLAINTIFF’S MOTION FOR PARTIAL SUMMARY JUDGMENT** with the Clerk of the Court through Case Management/Electronic Filing System.

Jesse M. Sbaih (#7898)
Ines Olevic-Saleh (#11431)
JESSE SBAIH & ASSOCIATES, LTD.
The District at Green Valley Ranch
170 South Green Valley Parkway, Suite 280
Henderson, Nevada 89012
isbaih@sbaihlaw.com
iolevic@sbaihlaw.com

Attorneys for Plaintiff

By */s/ Anne Cordell*
An Employee of LEWIS BRISBOIS BISGAARD
& SMITH LLP

Archived: Monday, November 30, 2020 1:57:57 PM

From: [Teegarden, Tara](#)

Sent: Monday, November 30, 2020 12:44:37 PM

To: [Cordell, Anne](#)

Cc: [Grames, Cheryl](#); [Freeman, Kristen](#)

Subject: FW: [EXT] RE: Desio, Rose v. SFMAIC, et al. -Motion for Partial Summary Judgment Deadline

Response requested: No

Sensitivity: Normal

Hi Anne,

Can you please file the SAO? Thank you.

Tara

Tara U. Teegarden

Attorney

Las Vegas Rainbow

702.693.1716 or x7021716

From: Jesse Sbaih <jsbaih@sbaihlaw.com>

Sent: Monday, November 30, 2020 12:28 PM

To: Teegarden, Tara <Tara.Teegarden@lewisbrisbois.com>

Cc: Grames, Cheryl <Cheryl.Grames@lewisbrisbois.com>; Cordell, Anne <Anne.Cordell@lewisbrisbois.com>; Bradley-Estrada, Mary <Mary.Bradley-Estrada@lewisbrisbois.com>; Freeman, Robert <Robert.Freeman@lewisbrisbois.com>; Freeman, Kristen <Kristen.Freeman@lewisbrisbois.com>; Ines <iolevic@sbaihlaw.com>; Jennifer Davidson <jdavidson@sbaihlaw.com>

Subject: RE: [EXT] RE: Desio, Rose v. SFMAIC, et al. -Motion for Partial Summary Judgment Deadline

Hi Tara...I hope you had a terrific Thanksgiving!

The draft SAO is fine. You may proceed with my e-signature.

Best regards,

Jesse M. Sbaih, Esq.

JESSE SBAIH & ASSOCIATES, LTD.

The District at Green Valley Ranch

170 South Green Valley Parkway, Suite 280

Henderson, Nevada 89012

Tel: (702) 896-2529

Fax: (702) 896-0529

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----- Original Message -----

Subject: RE: [EXT] RE: Desio, Rose v. SFMAIC, et al. -Motion for Partial Summary Judgment Deadline

From: "Teegarden, Tara" <Tara.Teegarden@lewisbrisbois.com>

Date: Mon, November 30, 2020 11:29 am

To: "Jesse Sbaih, Esq." <jsbaih@sbaihlaw.com>

Cc: "Grames, Cheryl" <Cheryl.Grames@lewisbrisbois.com>, "Cordell, Anne" <Anne.Cordell@lewisbrisbois.com>, "Bradley-Estrada, Mary" <Mary.Bradley-Estrada@lewisbrisbois.com>, "Freeman, Robert" <Robert.Freeman@lewisbrisbois.com>, "Freeman, Kristen" <Kristen.Freeman@lewisbrisbois.com>, Ines <iolevic@sbaihlaw.com>, Jennifer Davidson <jdavidson@sbaihlaw.com>

Good Morning,

Please find attached the draft SAO to extend the briefing schedule for your review. Please let me know if you have any edits you would like made. If not, do I have your permission to use your e-sig? Thank you.

Best regards,

Tara



Tara U. Teegarden
Attorney
Tara.Teegarden@lewisbrisbois.com
T: 702.693.1716 F: 702.366.9563

6385 South Rainbow Blvd., Suite 600, Las Vegas, NV 89118 | LewisBrisbois.com

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From: Jesse Sbaih, Esq. <jsbaih@sbaihlaw.com>

Sent: Wednesday, November 25, 2020 3:40 PM

To: Teegarden, Tara <Tara.Teegarden@lewisbrisbois.com>

Cc: Grames, Cheryl <Cheryl.Grames@lewisbrisbois.com>; Cordell, Anne <Anne.Cordell@lewisbrisbois.com>; Bradley-Estrada, Mary <Mary.Bradley-Estrada@lewisbrisbois.com>; Freeman, Robert <Robert.Freeman@lewisbrisbois.com>; Freeman, Kristen <Kristen.Freeman@lewisbrisbois.com>; Ines <iolevic@sbaihlaw.com>; Jennifer Davidson <jdavidson@sbaihlaw.com>

Subject: Re: [EXT] RE: Desio, Rose v. SFMAIC, et al. -Motion for Partial Summary Judgment Deadline

My pleasure! Happy Thanksgiving!

Jesse M. Sbaih, Esq.

Sent from my iPhone

On Nov 25, 2020, at 3:31 PM, Teegarden, Tara <Tara.Teegarden@lewisbrisbois.com> wrote:

We appreciate the extension and will forward a request to extend the briefing schedule for your review on Monday. Thanks again.



Tara U. Teegarden
Attorney
Tara.Teegarden@lewisbrisbois.com
T: 702.693.1716 F: 702.366.9563

6385 South Rainbow Blvd., Suite 600, Las Vegas, NV 89118 | LewisBrisbois.com

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From: Jesse Sbaih <jsbaih@sbaihlaw.com>
Sent: Wednesday, November 25, 2020 1:51 PM
To: Teegarden, Tara <Tara.Teegarden@lewisbrisbois.com>
Cc: Grames, Cheryl <Cheryl.Grames@lewisbrisbois.com>; Cordell, Anne <Anne.Cordell@lewisbrisbois.com>; Bradley-Estrada, Mary <Mary.Bradley-Estrada@lewisbrisbois.com>; Freeman, Robert <Robert.Freeman@lewisbrisbois.com>; Freeman, Kristen <Kristen.Freeman@lewisbrisbois.com>
Subject: [EXT] RE: Desio, Rose v. SFMAIC, et al. -Motion for Partial Summary Judgment Deadline

External Email

Sure!

Jesse M. Sbaih, Esq.
JESSE SBIAH & ASSOCIATES, LTD.
The District at Green Valley Ranch
170 South Green Valley Parkway, Suite 280
Henderson, Nevada 89012
Tel: (702) 896-2529
Fax: (702) 896-0529

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----- Original Message -----

Subject: Desio, Rose v. SFMAIC, et al. -Motion for Partial Summary Judgment Deadline
From: "Teegarden, Tara" <Tara.Teegarden@lewisbrisbois.com>
Date: Wed, November 25, 2020 1:38 pm

To: Jesse Sbaih <jsbaih@sbaihlaw.com>
Cc: "Grames, Cheryl" <Cheryl.Grames@lewisbrisbois.com>, "Cordell, Anne" <Anne.Cordell@lewisbrisbois.com>, "Bradley-Estrada, Mary" <Mary.Bradley-Estrada@lewisbrisbois.com>, "Freeman, Robert" <Robert.Freeman@lewisbrisbois.com>, "Freeman, Kristen" <Kristen.Freeman@lewisbrisbois.com>

Good Afternoon Jesse,

Would you consider a one week extension to the briefing schedule for responding to Plaintiff's Motion for Partial Summary Judgment? This would leave us at a response date of December 16, 2020. Please let us know. Thank you.

Best regard,

Tara



Tara U. Teegarden
Attorney
Tara.Teegarden@lewisbrisbois.com
T: 702.693.1716 F: 702.366.9563

6385 South Rainbow Blvd., Suite 600, Las Vegas, NV 89118 | LewisBrisbois.com

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