Case 2:20-cv-01921-RFB-EJY Document 22 Filed 12/15/20 Page 1 of 7 1 **SAO** LESLIE MARK STOVALL, ESO. 2 Nevada Bar No. 2566 STOVALL & ASSOCIATES 3 2301 Palomino Lane 4 Las Vegas, NV 89107 (702) 258-3034 5 (702) 258-0093 Facsimile Eservice: court@lesstovall.com 6 Attorneys for Plaintiffs 7 8 UNITED STATES DISTRICT COURT 9 **DISTRICT OF NEVADA** 10 FRONT SIGHT MANAGEMENT, LLC 11 dba. Front Sight Firearms Training Institute, ) 12 **Plaintiff** CASE NO: 2:20-CV-01921-RFB-EJY 13 vs. 14 State of Nevada 15 16 Defendant, 17 18 STIPULATION AND ORDER TO EXTEND THE TIME FOR RESPONSES AND 19 **REPLIES ON SEVERAL OUTSTANDING MOTIONS** 20 IT IS HEREBY STIPULATED AND AGREED BY AND BETWEEN plaintiff FRONT 21 SIGHT MANAGEMENT, LLC., by and through its attorney LESLIE MARK STOVALL, ESQ. 22 and defendant, STATE OF NEVADA, by and through its attorney CRAIG A. NEWBY, ESQ. 23 24 and hereby stipulate to the following: 25 1. Plaintiff's Response to Defendant's Motion to Dismiss [ECF 7] to be due on January 15, 26 2021 and Defendant will have to and including January 22, 2021 to file its replies. 27 28

## 1 2. Defendant's Responses to Plaintiff's Motion for Abstention [ECF No. 9 and 17] and 2 Motion for Remand [ECF No. 10] to be due on January 22, 2021 and Plaintiff's will have 3 to and including January 29, 2021 to file its replies. 4 DATED this day of December, 2020. DATED this 8<sup>th</sup> day of December, 2020. 5 STOVALL & ASSOCIATES OFFICE OF THE ATTORNEY GENERAL 6 7 /s/ Craig A. Newby 8 LESLIE MARK STOVALL, ESQ. CRAIG A. NEWBY, ESQ. Nevada Bar No. 2566 Nevada Bar No. 8591 2301 Palomino Lane 555 E. Washington Ave., Ste. 3900 10 Las Vegas, NV 89107 Las Vegas, Nevada 89101 Telephone: (702) 258-3034 Telephone: 702-4863420 11 Attorney for Plaintiff Attorney for Defendant 12 13 **ORDER** 14 IT IS HEREBY ORDERED 15 DATED this 15th day of December, 2020. 16 17 ARD F. BOULWARE, II THE HONORABL 18 UNITED STATES DISTRICT JUDGE 19 20 21 22 23 24 25 26 27 28

Case 2:20-cv-01921-RFB-EJY Document 22 Filed 12/15/20 Page 2 of 7

## Maria Hernandez

From: Craig A. Newby <CNewby@ag.nv.gov> on behalf of Craig A. Newby

**Sent:** Wednesday, December 9, 2020 12:46 PM **To:** Maria Hernandez; Sabrena K. Clinton

Subject: Re: Front Sight v. State of Nevada- Stipulation and Order

This works for me. Please add my e-signature for purposes of filing.

Happy holidays!

Craig

From: Maria Hernandez <maria@lesstovall.com> Sent: Wednesday, December 9, 2020 12:41 PM

To: Craig A. Newby <CNewby@ag.nv.gov>; Sabrena K. Clinton <SClinton@ag.nv.gov>

Subject: RE: Front Sight v. State of Nevada- Stipulation and Order

Good Afternoon Mr. Newby,

Enclosed please find the proposed stipulation and order for your review and signature if agreeable to you.

Thank you

Maria Hornandex



maria@lesstovall.com www.lesstovall.com Stovall & Associates 2301 Palomino Lane Las Vegas, NV 89107 P: (702) 258-3034

F: (702) 258-0093

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From: Craig A. Newby < <u>CNewby@ag.nv.gov</u>>
Sent: Wednesday, December 9, 2020 10:15 AM

To: Maria Hernandez <maria@lesstovall.com>; Sabrena K. Clinton <SClinton@ag.nv.gov>

Subject: Re: Front Sight v. State of Nevada- Stipulation and Order

Hello Maria:

Of course. To avoid having to address replies during his quarantine, I would suggest that we also extend the response date for Front Sight's pending motions as well.

Thank you and happy holidays,

Craig

From: Maria Hernandez < maria@lesstovall.com > Sent: Wednesday, December 9, 2020 10:06 AM

To: Sabrena K. Clinton < SClinton@ag.nv.gov > Cc: Craig A. Newby < CNewby@ag.nv.gov >

Subject: RE: Front Sight v. State of Nevada- Stipulation and Order

Good Morning Ms. Clinton,

Our office is respectfully requesting a 30 day extension of time for plaintiff to file its opposition to defendant's motion to dismiss. Mr. Stovall is in quarantine, he is over the age of 65 years old and with the holidays time is limited. Please advise if agreeable to you, if so I will send a stipulation for your signature. I am looking forward to hearing from you.

I greatly appreciate your courtesy and understanding during this difficult times.

Sincerely,





maria@lesstovall.com www.lesstovall.com Stovall & Associates 2301 Palomino Lane Las Vegas, NV 89107 P: (702) 258-3034 F: (702) 258-0093

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Subject: RE: Front Sight v. State of Nevada- Stipulation and Order

Thank you. Same to you.

From: Maria Hernandez <<u>maria@lesstovall.com</u>>
Sent: Friday, November 20, 2020 12:20 PM
To: Sabrena K. Clinton <<u>SClinton@ag.nv.gov</u>>

Subject: RE: Front Sight v. State of Nevada- Stipulation and Order

No problem,

Have a nice weekend.

Maria Hornandex



maria@lesstovall.com www.lesstovall.com Stovall & Associates 2301 Palomino Lane Las Vegas, NV 89107 P: (702) 258-3034 F: (702) 258-0093

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From: Sabrena K. Clinton < SClinton@ag.nv.gov > Sent: Friday, November 20, 2020 11:52 AM

To: Maria Hernandez < maria@lesstovall.com >

Subject: RE: Front Sight v. State of Nevada- Stipulation and Order

Thank you. I must have missed this.

From: Maria Hernandez <maria@lesstovall.com>
Sent: Friday, November 20, 2020 11:45 AM
To: Sabrena K. Clinton <SClinton@ag.nv.gov>

Subject: FW: Front Sight v. State of Nevada- Stipulation and Order

Please see email below.

Maria Hornandex



maria@lesstovall.com www.lesstovall.com Stovall & Associates 2301 Palomino Lane Las Vegas, NV 89107 P: (702) 258-3034 F: (702) 258-0093

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From: Maria Hernandez < maria@lesstovall.com > Sent: Thursday, November 19, 2020 10:06 AM
To: 'Sabrena K. Clinton' < Clinton@ag.nv.gov >

Cc: 'Craig A. Newby' < CNewby@ag.nv.gov >; Les Stovall < les@lesstovall.com >

Subject: RE: Front Sight v. State of Nevada- Stipulation and Order

Good Morning Ms. Clinton,

Mr. Stovall has no objection. He authorizes you to a-fix his electronic signature.

Thank you so much.

Maria Hornandez



maria@lesstovall.com www.lesstovall.com Stovall & Associates 2301 Palomino Lane Las Vegas, NV 89107 P: (702) 258-3034 F: (702) 258-0093

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From: Sabrena K. Clinton < <a href="mailto:SClinton@ag.nv.gov">Sent: Wednesday, November 18, 2020 4:17 PM To: Maria Hernandez <a href="mailto:Sclinton@ag.nv.gov">Maria Hernandez <a href="mailto:Sclintongov">Maria Hernandez <a href="mailto:Sclintongov">Maria Hernandez <a href="mailto:Sclintongov">Mailto:Sclintongov</a> <a href="mailto:Sclintongov">Sclintongov</a> <a href="mailto:Sclintongov">Mailto:Sclintongov</a> <a href="mailto:Sclintongov</a> <a href="mailto:Sclintongov</a> <a hr

Cc: Craig A. Newby < CNewby@ag.nv.gov>; Les Stovall < les@lesstovall.com>

Subject: Front Sight v. State of Nevada- Stipulation and Order

Ms. Hernandez:

Before submitting the stipulation and order, I have a point of clarification. The motion(s) for abstention, ECF No. 9 and ECF No. 17, are substantively the same. We intend to respond to both in one filing. To avoid any confusion with the court, I have specifically referenced both document numbers in the stipulation and order. Please see the attached and if Mr. Stovall has no objection, we will submit as previously authorized. Thank you.

Regards,

Sabrena K. Clinton
Deputy Attorney General
Office of the Attorney General
555 E. Washington Ave., Ste. 3900
Las Vegas, NV 89101
702-486-5708

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