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Attorneys For Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

15 WENDY J. PAULUK, Psy.D.,
 16 individually; WENDY PAULUK, Psy. D.
 17 as Personal Representative of the ESTATE
 OF DANIEL PAULUK; JAIME L.
 18 PAULUK; and CHRISSY J. PAULUK,

Plaintiffs,

vs.

21 CLARK COUNTY HEALTH DISTRICT;
 22 GLENN SAVAGE, in both his individual
 and official capacities; EDWARD
 23 WOJCIK, in both his individual and official
 capacities; DOES I through X; DOES XI
 24 through XX; and ROE CORPORATIONS
 XXI through XXX, inclusive,

Defendants.

CASE NO.: 2:07-cv-1681-RFB-VCF

**STIPULATION TO EXTEND TIME
TO FILE JOINT PRETRIAL ORDER**

[SECOND REQUEST]

1 COME NOW PLAINTIFFS WENDY J. PAULUK, individually and as Personal
2 Representative of the ESTATE OF DANIEL PAULUK; JAIME L. PAULUK; and CHRISSY J.
3 PAULUK, by and through their counsel of record, BROCK OHLSON, ESQ. of BROCK K.
4 OHLSON PLLC, CHRISTOPHER D. CAZARES, ESQ. of CAZARES LAW FIRM, and A. J.
5 SHARP, ESQ. of SHARP LAW CENTER, and Defendant CLARK COUNTY HEALTH
6 DISTRICT, by and through its counsel of record, Walter L. Cannon, Esq. and Peter M. Angulo,
7 Esq. of OLSON, CANNON, GORMLEY, ANGULO & STOBERSKI LLP, and stipulate,
8 subject to this Court’s approval, to extend the time for filing of the parties’ Joint Pretrial order
9 by 14 days, through **October 19, 2018**. **This is the parties’ second request for extension.**

10 This Court previously ordered that the parties file the Joint Pretrial Order on or before
11 October 5, 2018. *Docket Filing #238*. The parties have made significant progress on their
12 respective portions. **However, the parties were prevented from meeting and conferring**
13 **regarding the final joint document when Plaintiffs’ counsel CHRISTOPHER D.**
14 **CAZARES, ESQ. was unexpectedly hospitalized in Los Angeles and required to travel**
15 **back to Arizona to consult with his primary care physician and a cardiologist. See**
16 **Declaration of Christopher D. Cazares, Esq., *infra*.**

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DECLARATION OF CHRISTOPHER D. CAZARES, ESQ.
IN SUPPORT OF STIPULATION TO EXTEND TIME
TO FILE JOINT PRETRIAL ORDER [SECOND REQUEST]

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1. I am an attorney duly licensed to practice law in the State of Arizona, admitted to practice *pro hac vice* in this matter as counsel of record for Plaintiffs. *Docket Filing #240*.

2. This Declaration is made in support of the parties' Stipulation To Extend Time To File Joint Pretrial Order [Second Request].

3. The parties have communicated and cooperated in anticipation of filing the Joint Pretrial Order by October 5, 2018, the date set by this Court in its Order on the parties prior Stipulation. *Docket Filing #238*. As the parties were finalizing their respective portions of this document, Defense counsel and I had agreed to meet and confer.

4. On October 1-2, 2018, while in Los Angeles, California, I was hospitalized with severe chest pains. This episode prevented me from returning to Las Vegas, requiring me instead to travel back to Sierra Vista, Arizona, in order to see my primary care physician on October 4, 2018, to obtain a referral to a cardiologist. As a result of the both the hospitalization and the travel back to Arizona, Plaintiffs' counsel were unable to finalize Plaintiffs' portion of the JPTO or to meet and confer with Defense counsel on October 4, 2018.

5. Because of this event, Defense counsel and I were prevented from meeting and conferring as planned, and the parties are therefore unable to submit a Joint Pretrial Order on October 5, 2018.

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Christopher D. Cazares

CHRISTOPHER D. CAZARES

1 The parties aver that this extension is requested in good faith and not for purposes of
2 delay, and respectfully request that this Court extend the Joint Pretrial Order deadline to
3 **October 19, 2018.**

4 IT IS SO STIPULATED.

5 DATED the 5th day of October, 2018.

6 **SHARP LAW CENTER**

7
8 /s/ *A. J. Sharp*

9 _____
10 A. J. Sharp
11 11700 West Charleston Boulevard
12 Suite 234
13 Las Vegas, NV 89135
14 *Attorney for Plaintiffs*

DATED the 5th day of October, 2018.

**OLSON, CANNON, GORMLEY,
ANGULO & STOBERSKI LLP**

8 /s/ *Walter R. Cannon*

9 _____
10 Walter R. Cannon, Esq.
11 Peter M. Angulo, Esq.
12 9950 West Cheyenne Avenue
13 Las Vegas, NV 89129
14 *Attorneys for Defendant*
15 *Clark County Health District*

16 **ORDER**

17 IT IS SO ORDERED.

18 Dated this 8th day of October, _____, 2018.

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22 RICHARD F. BOULWARE, II
23 United States District Court
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