DANIEL G. BOGDEN
United States Attorney
District of Nevada

KRYSTAL J. ROSSE
Nevada Bar No. 11573
LINDSY M. ROBERTS
Assistant United States Attorneys
501 Las Vegas Boulevard South, Suite 1100
Las Vegas, Nevada 89101
Telephone: 702-388-6336
Email: *krystal.rosse@usdoj.gov;*
lindsy.roberts@usdoj.gov

Attorneys for the United States.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ROSEMARY GARITY, Plaintiff, v. USPS PMG MEGAN J. BRENNAN, Defendant.	Case No. 2:11-cv-01805-RFB-CWH **CORRECTED JOINT STIPULATION TO EXTEND DEADLINE TO FILE JOINT PRETRIAL ORDER (First Request)**

Pursuant to Local Rules 7-1, 26-4, and Fed. R. Civ. P. 6(b), the parties stipulate, subject to the Court's approval, a twenty-one-day extension of time, from October 17, 2016 to November 7, 2016, to submit the proposed joint pretrial order in this matter. This is the first request to extend this deadline and is timely in that it is made prior to the deadline. However, it is not timely in that it is made less than twenty-one days before the expiration of the subject deadline. Nonetheless, the parties' stipulation should be approved because, as discussed more fully below, this stipulation is being filed for good cause.

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Discovery Completed:

Discovery is complete in this case.

Discovery That Remains to be Completed:

No discovery remains to be completed

Reasons Why Remaining Discovery Was Not Completed, and Otherwise the Good Cause for the Requested Extension:

There is no remaining discovery. This request is to extend only the existing deadline (of October 17, 2016) to submit a joint pretrial order.

On September 22, 2016, Plaintiff filed her Motion for Reconsideration on Granted Portions of ECF # 316 Order (ECF No. 317). Shortly thereafter, the parties discussed filing a stipulation to stay the deadline to file the joint pretrial order until thirty days after the Court's order on Plaintiff's Motion for Reconsideration. However, Plaintiff ultimately decided to move forward with filing the joint pretrial order prior to the Court's ruling. Since that time, Plaintiff and Federal Defendant's counsel have been working together in drafting the joint pretrial order. The parties have discussed at length the requirements set forth in LR 16-3(b)(8), and continue to diligently review and identify readily identifiable exhibits in the extensive record of this matter. During the last few weeks, both Plaintiff and Federal Defendant have devoted extensive time and attention to the joint pretrial order. Despite the parties' best efforts, additional time is necessary to draft, meet and confer, and finalize the joint pretrial order.

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Proposed Schedule for Completing Remaining Discovery:

There is no remaining discovery to complete. Based on the reasons and circumstances provided above, the parties request a twenty-one-day extension of time, from October 17, 2016 to November 7, 2016, to submit the proposed joint pretrial order in this matter.

Respectfully submitted this 14th day of October 2016.

DANIEL G. BOGDEN
United States Attorney

/s/ Rosemary Garity
ROSEMARY GARITY
3231 N. Florenza Street
Pahrump, Nevada 89060

Pro Se Plaintiff

/s/ Krystal J. Rosse
KRYSTAL J. ROSSE
LINDSY M. ROBERTS
Assistant United States Attorneys

Attorneys for the United States

IT IS SO ORDERED. :

RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED: October 17, 2016.