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13 Attorneys for Plaintiffs

14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

16 JENNIFER KWASNIEWSKI, individually and
17 as Special Administrator of the ESTATE OF
18 ANDREW A. KWASNIEWSKI; TAYLOR L.
19 KWASNIEWSKI; and DYLAN A.
20 KWASNIEWSKI, a minor, by and through
21 Jennifer Kwasniewski, his mother and guardian,

22 Plaintiffs,

23 vs.

24 SANOFI-AVENTIS U.S. LLC, a Delaware
25 limited liability company; DOES I through X,
26 inclusive; and ROE CORPORATIONS I
27 through X, inclusive,

28 Defendants.

Case No. 2:12-cv-00515-GMN-CWH

**STIPULATION FOR EXTENSION OF
TIME TO FILE PLAINTIFFS' RESPONSE
TO DEFENDANTS MOTION FOR
PROTECTIVE ORDER /DOCKET 226/**

/First Request/

29
30 IT IS HEREBY STIPULATED by and between Plaintiffs Jennifer Kwasniewski,
31 individually and as Special Administrator of the Estate Of Andrew A. Kwasniewski; Taylor L.
32 Kwasniewski; and Dylan A. Kwasniewski, a minor, by and through Jennifer Kwasniewski, his
33 mother and guardian, by and through their attorneys of record Murdock & Associates, Chtd. and

1 Eckley M. Keach, Chtd., and Defendant SANOFI-AVENTIS U.S. LLC, by and through its
2 attorneys of record Morris Law Group and Shook, Hardy & Bacon, LLP, that Plaintiffs shall have
3 until Friday, September 8, 2017, to file their Response to Defendant Sanofi-Aventis, U.S., LLC's
4 Motion for Protective Order (Docket 226). Currently, Plaintiffs' Response is due on August 28,
5 2017. The reason for the requested extension is that Counsel for Plaintiffs (Mr. Murdock) was out
6 of town from 8/14/17 through 8/18/17 taking FRCP 30(B)6 depositions in New Jersey, and will be
7 out of town from 8/21/17 through 8/28/17 (taking son to College at Columbia University in New
8 York). He also will be out of town in Cleveland, Ohio from 9/1/17 through 9/4/17 attending a
9 wedding. This is the First Request for an extension.
10
11

12 IT IS SO STIPULATED.

13 Dated this 21st day of August, 2017.

14 MURDOCK & ASSOCIATES, CHTD.
15 ECKLEY M. KEACH, CHTD.

16 /s/ Robert E. Murdock
17 Robert E. Murdock, Esq.
18 Eckley M. Keach, Esq.
19 521 S. Third Street
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21 *Attorneys for Plaintiffs*

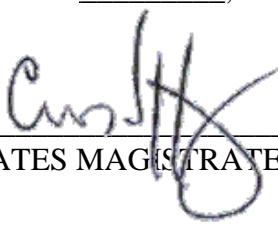
MORRIS LAW GROUP

22 /s/ Rosa Solis-Rainey
23 Steve Morris, Esq.
24 Rosa Solis-Rainey, Esq.
25 411 E. Bonneville Ave., Ste. 360
26 Las Vegas, NV 89101

27 SHOOK HARDY BACON, LLP
28 Jon Andrew Strongman, Esq. (*pro hac vice*)
Eric Swan, Esq. (*pro hac vice*)
Harvey L Kaplan, Esq. (*pro hac vice*)
2555 Grand Blvd
Kansas City, MO 64108
Attorney for Defendant Sanofi-Aventis US, LLC

24 **ORDER**

25
26 IT IS SO ORDERED this August 22 _____, 2017.
27
28


UNITED STATES MAGISTRATE JUDGE