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6 **UNITED STATES DISTRICT COURT**  
 7  
 8 **CLARK COUNTY, NEVADA**

9 \* \* \* \* \*

10	TRINA BRITAIN, KARL BEAVERS,	)	CASE NO: 2:12-cv-01240-JAD-NJK
11	RONALD BROOKS, BRET CEGAVSKE,	)	
12	BILLY CRANK, DENNIS CURRAN, KEVIN	)	<b>STIPULATION AND ORDER TO</b>
13	ECKHART, KENNETH HAWKES, RANDY	)	<b>EXTEND THE TIME FOR FILING</b>
14	HAWKES, IAN MASSY, RIC MOON,	)	<b>THE JOINT PRE-TRIAL ORDER</b>
15	GRAJEDA NUBIA, MICHAEL PETTY,	)	
16	KAREN PIXLER, ERIC PRUNTY,	)	<b>(First Request)</b>
17	ANTHONY RUSSO, TOM SERRANO,	)	
18	ANTHONY SMITH, MICHAEL SMITH,	)	
19	ENRIQUE STIEGELMEYER, ANTHONY	)	
20	VOGEL, and LAMONS WALKER,	)	
21		)	
22	Plaintiff,	)	
23		)	
24	vs.	)	
25		)	
26	CLARK COUNTY, NEVADA,	)	
27		)	
28	Defendant.	)	

IT IS HEREBY STIPULATED between the parties, by and through their respective counsel, that the parties shall have an additional ninety (90) days in which to file their Joint Pre-Trial Order. The Joint Pre-Trial Order is currently due on April 30, 2015.

The extension is requested and based on the following:

Robert W. Freeman, counsel for defendants has been involved in multi day out of state

**LEWIS**  
**BRISBOIS**  
**BISGAARD**

1 depositions during the month of April 2015 in *Hackler v. State Farm, 3:14-cv-0531-MMD-VPC*.  
2 Further depositions in this matter are expected to continue through late May and early June. In  
3 addition counsel for defendants is involved in preparing a motions for summary judgment in  
4 *Graham v. City of North Las Vegas, 2:13-cv-1818-KJD-VCF* and *Plank v. Mayoral, 2:12-cv-2205-*  
5 *JCM-PAL*. In addition counsel is preparing an opening brief in *Koiro v. Catanese, 14-17514*.

7 Finally, counsel for defendants in preparing for trial in *Schwartz v. GEICO, A594541*, set  
8 to begin June 22, 2015.

9 Counsel for plaintiffs counsel just finished a three (3) day hearing before the Employee  
10 Management Relations Board (“EMRB”) in *O’Leary v Las Vegas Metropolitan Police*  
11 *Department*, EMRB Case No. A1-046116 and is currently preparing for back to back cases before  
12 the EMRB in *NCLEA v Nye County*, EMRB Case No. A1-046123 and *ESEA/POA of CCSD v*  
13 *Clark County School District*, EMRB Case No. A1-046113 which are scheduled to begin on June  
14 9, 2015.  
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17 In addition, counsel for plaintiff’s wife was hospitalized on February 17, 2015 with a life  
18 threatening cardiac condition which has limited his availability.

19 The additional time will allow the parties the necessary time to prepare the Joint Pre-Trial  
20 Memo.

21 Based on the foregoing, the parties request that this Court order the time for to file the Joint  
22 Pre-Trial order be extend ninety (90) days up to and including July 29, 2015.

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2 The parties acknowledge that this stipulation is made in good faith and not for purposes of  
3 delay.  
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5 DATED this 22nd day of April, 2015.

DATED this 22nd day of April, 2015.

6 LEWIS BRISBOIS BISGAARD & SMITH

LAW OFFICE OF DANIEL MARKS

7  
8 /s/ Robert W. Freeman

/s/ Adam Levine

9 Robert W. Freeman, Esq.

Adam Levine, Esq.

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11 Attorneys for Defendant

Attorneys for Plaintiffs

12 Clark County

13  
14 **ORDER**

15 IT IS SO ORDERED.

16 Dated: April 23, 2015.

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20 U.S. DISTRICT COURT JUDGE