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 CLARK COUNTY SCHOOL DISTRICT,
 14 EDWARD GOLDMAN and ANITA WILBUR

15 **UNITED STATES DISTRICT COURT**
 16 **DISTRICT OF NEVADA**

18 ELENA RODRIGUEZ-MALFAVON,
 19 Plaintiff,

20 vs.

21 CLARK COUNTY SCHOOL DISTRICT,
 22 EDWARD GOLDMAN and ANITA
 WILBUR,
 23 Defendant.

CASE NO. 2:12-CV-01673-APG-PAL

**STIPULATION AND ORDER TO EXTEND
 TIME FOR PLAINTIFF TO FILE AN
 OPPOSITION TO DEFENDANTS'
 MOTION FOR SUMMARY JUDGMENT**

[SECOND REQUEST]

25 In compliance with Local Rules 6-1 and 26-4, Defendants CLARK COUNTY SCHOOL
 26 DISTRICT, EDWARD GOLDMAN and ANITA WILBUR (collectively referred to as
 27 "Defendants") and Plaintiff ELENA RODRIGUEZ-MALFAVON ("Plaintiff"), by and through
 28 their respective counsel of record, hereby stipulate and agree to extend the time for Plaintiff to file

1 an opposition to Defendants' Motion for Summary Judgment (Doc #39) filed January 7, 2015 by
2 120-days. The initial deadline for filing the opposition was February 2, 2015. Pursuant to the
3 parties' first stipulation to extend the deadline for Plaintiff to file an opposition to Defendants'
4 Motion for Summary Judgment, the deadline was extended to March 4, 2015. The new deadline
5 for Plaintiff's opposition will be, up to and including, **July 1, 2015**.

6 This stipulation is submitted as an extension is necessary because Plaintiff's counsel is
7 continuing to assist with a family member's medical condition which requires regular treatment at
8 the Mayo Clinic in Phoenix, Arizona. Additionally, from now until June 1, 2015, Plaintiff's
9 counsel will be spending his weekdays and some weekends serving as a State Senator in the
10 Nevada legislature in Carson City, Nevada. To that end, NRS 1.310(2) and (3) provide that:

11 2. If an attorney for a party to any action or proceeding in any
12 court or before any administrative body, who was actually employed
13 before the commencement of any legislative session, is a member of
14 the Legislature of the State of Nevada, or is President of the Senate,
15 that fact is sufficient cause for the adjournment or continuance of the
16 action or proceeding, including, without limitation, any discovery or
17 other pretrial or posttrial matter involved in the action or proceeding,
18 for the duration of any legislative session.

19 3. The adjournment or continuance provided for in subsections 1
20 and 2 must be granted without the imposition of terms.

21 Although this Court is obviously not bound by Nevada law, it can certainly look to guidance set
22 forth in Nevada law if it is relevant.

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1 The parties agree and represent to the Court that this request is made in good faith and not for
2 the purposes of delay. They also agree that given the length of this proposed continuance no further
3 extensions will be granted to the Plaintiff and/or her attorney.
4

5 Dated: March 3, 2015

Dated: March 3, 2015

6 Respectfully submitted,

Respectfully submitted,

7
8 /s/ Richard Segerblom
9 RICHARD SEGERBLOM, ESQ.
10 Attorney for Plaintiff
ELENA RODRIGUEZ-MALFAVON

/s/ Ethan D. Thomas
PATRICK H. HICKS, ESQ.
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LITTLER MENDELSON, P.C.

11 Attorneys for Defendants
12 CLARK COUNTY SCHOOL DISTRICT,
13 EDWARD GOLDMAN and ANITA WILBUR

14 **ORDER**

15 **IT IS SO ORDERED.**

16 Dated: March 3, 2015.

17
18 

19 UNITED STATES DISTRICT COURT JUDGE

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