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 10 CLARK COUNTY SCHOOL DISTRICT,
 EDWARD GOLDMAN and ANITA WILBUR

11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13
 14 ELENA RODRIGUEZ-MALFAVON,

15 Plaintiff,

16 vs.

17 CLARK COUNTY SCHOOL DISTRICT,
 EDWARD GOLDMAN and ANITA
 18 WILBUR,

19 Defendants.

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

**STIPULATION AND
 ORDER TO EXTEND TIME FOR
 DEFENDANTS TO FILE A REPLY IN
 SUPPORT OF THEIR MOTION FOR
 SUMMARY JUDGMENT**

[FIRST REQUEST]

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 21 In compliance with Local Rules 6-1 and 26-4, Plaintiff ELENA RODRIGUEZ-
 22 MALFAVON (hereinafter "Plaintiff") and Defendants CLARK COUNTY SCHOOL DISTRICT,
 23 EDWARD GOLDMAN and ANITA WILBUR (hereinafter "Defendants"), by and through their
 24 counsel of record, hereby stipulate and agree to extend the time for Defendants to file a Reply in
 25 Support of Their Motion for Summary Judgment, up to and including **October 7, 2015**.

26 Defendants' Motion for Summary Judgment was filed on January 7, 2015. **[Doc. #39]**. The
 27 initial deadline for filing the opposition was February 2, 2015. Pursuant to the parties' first
 28 stipulation to extend the deadline for Plaintiff to file an opposition to Defendants' Motion, the

1 deadline was extended to March 4, 2015. [Doc. #41]. The parties subsequently stipulated to a
2 second extension up to and including July 1, 2015 in light of Plaintiff's Counsel's service as a State
3 Senator in the Nevada legislature in Carson City, Nevada and because Plaintiff's counsel was
4 assisting with a family member's medical condition which required regular treatments at the Mayo
5 Clinic in Phoenix, Arizona. [Doc. #43]. The parties then stipulated to a third extension up to and
6 including July 30, 2015 in light of Plaintiff's Counsel's continued assistance with his family
7 member's medical condition. [Doc. #45]. As part of Plaintiff's third stipulated extension, the
8 parties also stipulated to enlarge the time for Defendants to file a reply in support of their Motion, up
9 to and including, the current deadline of **August 28, 2015**. [Dkt. #45]. Plaintiff's opposition to
10 Defendants' Motion was filed on July 30, 2015. [Dkt. # 46].

11 The parties agree that this extension is necessary because (1) Defense counsel has
12 experienced a heavy workload throughout the month of August preventing him from having
13 adequate time to prepare the reply; (2) from August 21, 2015 to September 8, 2015, Defense
14 Counsel will be on paternity leave; and (3) when counsel returns from leave, he will need sufficient
15 time to prepare the reply, in addition to completing other tasks relating to his case load.

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The parties agree and represent to the Court that this request is made in good faith and not for the purpose of delay.

Dated: August 24, 2015

Dated: August 24, 2015

Respectfully submitted,

Respectfully submitted,

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


/s/ Ethan D. Thomas
PATRICK H. HICKS, ESQ.
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ETHAN D. THOMAS, ESQ.
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Attorneys for Defendants
CLARK COUNTY SCHOOL DISTRICT,
EDWARD GOLDMAN and ANITA WILBUR

ORDER

IT IS SO ORDERED.

Dated: August 24, 2015.


UNITED STATES DISTRICT COURT JUDGE