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 CLARK COUNTY SCHOOL DISTRICT,  
 10 EDWARD GOLDMAN and ANITA WILBUR

11 **UNITED STATES DISTRICT COURT**  
 12 **DISTRICT OF NEVADA**

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

**[PROPOSED] STIPULATION AND  
 ORDER TO EXTEND TIME FOR THE  
 PARTIES TO FILE A JOINT PRETRIAL  
 ORDER**

**[FIRST REQUEST]**

21 Plaintiff, ELENA RODRIGUEZ-MALFAVON and Defendant, CLARK COUNTY  
 22 SCHOOL DISTRICT<sup>1</sup>, by and through their respective counsel of record, do hereby stipulate and  
 23 agree to extend the current deadline to file a Joint Pretrial Order of January 6, 2016, by an additional  
 24 30 days, up to and including **February 5, 2016**.

25 The parties agree that the instant extension is necessary because the caseload of counsel for

26 <sup>1</sup> While not specifically addressed in the Court's Order, Defendants Edward Goldman and Anita Wilbur were effectively  
 27 dismissed from this action by virtue of the Court's decision on Defendants' Motion for Summary Judgment. [**Doc. #50**].  
 28 As noted in that Order, the only remaining claim to be resolved at trial is Plaintiff's Title VII retaliation claim pertaining  
 to her time in the Purchasing Department, which by law cannot be asserted against individual Defendants Goldman and  
 Wilbur.

1 both parties during the month of December has not allowed them sufficient time to discuss and come  
2 to an agreement on various issues in order to complete the Pretrial Order. The instant extension is  
3 also necessary because of previously scheduled time away from the office by counsel for both  
4 parties. It is important to note that a trial date has not yet been set in this case, and as such, the trial  
5 will not need to be postponed due to the requested extension.

6 This is the parties' first request for an extension of this deadline and it is sought in good faith  
7 and not for the purpose of delay.

8 Dated: December 29, 2015

Dated: December 29, 2015

9 Respectfully submitted,

Respectfully submitted,

11 /s/ Richard Segerblom  
12 RICHARD SEGERBLOM, ESQ.

/s/ Ethan D. Thomas  
BRUCE C. YOUNG, ESQ.  
ETHAN D. THOMAS, ESQ.  
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13 Attorney for Plaintiff  
14 ELENA RODRIGUEZ-MALFAVON

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

17 **ORDER**

18 **IT IS SO ORDERED.**

19  
20 Dated: December 30, 2015.

21  
22   
23 UNITED STATES MAGISTRATE JUDGE