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

.....

13 DAVID EDWIN PLANK,

14 Plaintiff,

Case No. 2:12-cv-02205-JCM-PAL

15 vs.

16 LAS VEGAS METROPOLITAN  
 17 POLICE DEPARTMENT, a political  
 subdivision of the State of Nevada;  
 18 OFFICER B. MAYORAL, individually;  
 and JOHN DOES I-X, inclusive,

19 Defendants.

20 \_\_\_\_\_ /  
 21 **STIPULATION AND ORDER TO EXTEND RESPONSES TO MOTIONS FOR**  
 22 **SUMMARY JUDGMENT AND REPLIES THERETO**

23 **(First Request)**

24 IT IS HEREBY STIPULATED AND AGREED, by and between the Plaintiff, DAVID  
 25 EDWIN PLANK, by and through his counsel, CAL J. POTTER, III, ESQ. and C. J. POTTER, IV,  
 26 ESQ. of POTTER LAW OFFICES and KRISTINE K. JENSEN, ESQ.; Defendant, LAS VEGAS  
 27 METROPOLITAN POLICE DEPARTMENT by and through their attorney THOMAS D.  
 28 DILLARD, ESQ. of OLSON CANNON GORMLEY ANGULO & STOBERSKI; and Defendant,

1 OFFICER B. MAYORAL by and through his attorney ROBERT W. FREEMAN, JR., ESQ. of  
2 LEWIS BRISBOIS BISGAARD & SMITH that the date for Plaintiff's Response to the Defendant  
3 LVMPD's Motion for Summary Judgment [doc. 36] currently due Monday, May 4, 2015 be  
4 extended up to and including Friday, July 10, 2015. The Plaintiff requests this large extension in  
5 order for the Response to coincide with the filing of the Response to Defendant Officer Mayoral's  
6 Summary Judgment.<sup>1</sup>

7 Plaintiff submits that good cause exists for this extension as Plaintiff's counsel has been  
8 unable to complete the Response due to other deadlines, numerous appearances, and multiple  
9 depositions. Based upon the foregoing, the parties request that this Court order the time for the  
10 Plaintiff to file his Responses to Defendants' Motions for Summary Judgment to Friday, July 10,  
11 2015.

12 This is the first request for enlargement of time is made in good faith and not for the purposes  
13 of delay.

14 APPROVED AS TO FORM AND CONTENT.

15 DATED this 4<sup>th</sup> day of May, 2015.

DATED this 4<sup>th</sup> day of May, 2015.

16 POTTER LAW OFFICES  
17 KRISTINE K. JENSEN, LTD.

LEWIS BRISBOIS BISGAARD & SMITH

18 By /s/ Cal J. Potter, III, Esq.  
19 CAL J. POTTER, III, ESQ.  
20 Nevada Bar No. 1988  
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By /s/ Robert W. Freeman, Jr., Esq.  
ROBERT W. FREEMAN, JR., ESQ.  
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Las Vegas, Nevada 89118  
*Attorney for Defendant, Officer Mayoral*

KRISTINE K. JENSEN, ESQ.  
Nevada Bar No. 9302  
3401 West Charleston Blvd.  
Las Vegas, Nevada 89102  
*Attorneys for Plaintiff*

DATED this 4<sup>th</sup> day of May, 2015.

OLSON, CANNON, GORMLEY,  
ANGULO & STOBERSKI

By /s/ Thomas D. Dillard, Esq.  
THOMAS D. DILLARD, ESQ.  
Nevada Bar No. 6271  
9950 West Cheyenne Avenue  
Las Vegas, Nevada 89129  
*Attorneys for Defendant, LVMPD*

<sup>1</sup>Defendant Officer Mayoral's dispositive motion deadline was extended to June 3, 2015 [doc. 39].

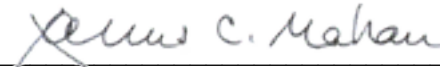
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**ORDER**

IT IS SO ORDERED.

May 5, 2015

DATED

  
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UNITED STATES DISTRICT COURT JUDGE