1 2 3 4 5	ROBERT W. FREEMAN Nevada Bar No. 3062 LEWIS BRISBOIS BISGAARD & SMITH LLP 6385 S. Rainbow Boulevard, Suite 600 Las Vegas, Nevada 89118 702.893.3383 FAX: 702.893.3789 Attorneys for Defendant Officer Brad Mayoral		
6	LIMITED STATES DISTRICT COLIDT		
7	UNITED STATES DISTRICT COURT		
8	DISTRICT OF NEVADA, SOUTHERN DIVISION ***		
9	DAVID EDWIN PLANK,	CASE NO. 2-12-cv-02205-JCM-PAL	
10	Plaintiff,	DEFENDANT BRAD MAYORAL'S	
11	VS.	STIPULATION AND ORDER TO EXTEND THE DEADLINE FOR FILING	
12	LAS VEGAS METROPOLITIAN POLICE	THE REPLY IN SUPPURT OF MOTION FOR SUMMARY JUDGMENT	
13	DEPARTMENT, a political subdivision of the State of Nevada; OFFICER B. MAYORAL,	(First Request)	
14	individually; and JOHN DOES I-X, inclusive,	•	
15	Defendants.		
16	COMES NOW, Plaintiff and Defendant Brad Mayoral, by and through their respective		
17	counsel of record and hereby stipulate that the scheduled date for filing the reply in support of the		
18	motion for summary judgment and joinders thereto, currently due on Monday, July 27, 2015 be		
19 20	extended 14 (fourteen) days up to and including Monday, August 10, 2015.		
	Robert Freeman, Esq. counsel for Defendant Brad Mayoral has been participating in		
211	Robert Freeman, Esq. counsel for Defend	lant Brad Mayoral has been participating in	
21	Robert Freeman, Esq. counsel for Defend several multi-day depositions in <i>State Farm adv</i> .	•	
22	_	Hackler, 3:14-cv-0531-MMD-VPC and State	
	several multi-day depositions in <i>State Farm adv</i> .	Hackler, 3:14-cv-0531-MMD-VPC and State	
22 23	several multi-day depositions in <i>State Farm adv</i> . Farm adv. Perez, 2:14-cv-2005-APG-PAL and he	Hackler, 3:14-cv-0531-MMD-VPC and State as not had adequate time to prepare the reply	
22 23 24	several multi-day depositions in <i>State Farm adv</i> . Farm adv. Perez, 2:14-cv-2005-APG-PAL and helpitef.	Hackler, 3:14-cv-0531-MMD-VPC and State as not had adequate time to prepare the reply	
22232425	several multi-day depositions in <i>State Farm adv</i> . Farm adv. Perez, 2:14-cv-2005-APG-PAL and helpitef.	Hackler, 3:14-cv-0531-MMD-VPC and State as not had adequate time to prepare the reply	
22 23 24 25 26	several multi-day depositions in <i>State Farm adv</i> . Farm adv. Perez, 2:14-cv-2005-APG-PAL and helpitef.	Hackler, 3:14-cv-0531-MMD-VPC and State as not had adequate time to prepare the reply	

1	WHEREFORE, the parties respectfully request that the Court extend the date for		
2	Defendant Mayoral to file his reply in support of motion for summary judgment, currently due on		
3	July 27, 2015, be extended fourteen (14) days up to and including August 11, 2015.		
4	Dated this <u>27th</u> day of July, 2015.	Dated this <u>27th</u> day of July, 2015.	
5	LEWIS BRISBOIS BISGAARD & SMITH LLP	POTTER LAW OFFICES	
6	/s/ Robert W. Freeman	/s/ C.J. Potter, IV, Esq.	
7	Robert W. Freeman, Jr., Esq. Nevada Bar No. 3062	Cal J. Potter, Esq. Nevada Bar No. 1988	
8	1060 Wigwam Parkway	C.J. Potter, IV, Esq. Nevada Bar No. 13225	
9	Henderson, Nevada 89074 Attorney for Defendant	1125 Shadow Lane	
10	Officer Brad Mayoral	Las Vegas, Nevada 89102 Attorneys for Plaintiff	
11		David Edwin Plank	
12	Design of the second of the se	W W. L	
13	Dated this <u>27th</u> day of July, 2015.	Kristine K. Jensen, ESQ. Nevada Bar No. 9302	
	OLSON, CANNON, GORMELY, ANGULO, STOBERSKI	3401 West Charleston Blvd.	
14		Las Vegas, Nevada 89102 Attorneys for Plaintiff	
15	Thomas D. Dillard, Esq. THOMAS D. DILLARD, ESQ.		
16	Nevada Bar No. 6271		
17	9950 West Cheyenne Avenue Las Vegas, Nevada 89129		
18	Attorneys for Defendant, LVMPD		
19	<u>ORDER</u>		
20			
21	IT IS SO ORDERED.		
22	Dated July 28, 2015.		
23		Xellus C. Mahan	
24		U.S. DISTRICT COURT JUDGE	
25			
26			
27			

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