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11 UNITED STATES DISTRICT COURT
12 DISTRICT OF NEVADA

13 TIFFANY RODRIGUEZ,)
14 Plaintiff,) Case No.: 2:13-cv-00566-GMN-VCF
15 v.)
16 UNITED STATES OF AMERICA, *et al.*,) **STIPULATION AND ORDER**
17 Defendants.) (Second Request)

18 Pursuant to Local Rules 6-1 and 26-4, the United States and Plaintiff stipulate to, and request
19 that the Court approve, a twenty-one-day extension of the deadlines for dispositive motions and the
20 pretrial order (established in the Discovery Plan and Scheduling Order, ECF No. 8, filed January 17,
21 2014) as, and for the reasons, set forth below. This is the second request for such an extension.

22 This action arises out of an alleged slip-and-fall incident at the Commissary located on Nellis
23 Air Force Base. Without waiver or admission by the Plaintiff for purposes of trial, the injuries and
24 medical expenses in this matter are relatively minor.
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1 The principal attorney for the defendants in this action, Patrick Rose, is currently in training
2 during this entire week, and will be engaged all of next week in taking depositions of expert
3 witnesses in Reno, Nevada in the case of *Ministerio Roca Solida v. United States*, No. 2:12-cv-1488-
4 RCJ-VCF. As a result, Mr. Rose will be unable to prepare and file a dispositive motion in this
5 matter by the currently scheduled deadline of April 21, 2014. The parties therefore jointly request
6 that the Court extend the following two deadlines in this matter:

<u>Event</u>	<u>Extend From:</u>	<u>To:</u>
8 Dispositive Motions	April 21, 2014	May 12, 2014
9 Joint Pretrial Order	May 21, 2014	June 11, 2014

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11 This stipulated request is submitted in good faith and not for purposes of undue delay.

12 Respectfully submitted this 8th day of April, 2014.

13 DANIEL G. BOGDEN
14 United States Attorney

RICHARD HARRIS LAW FIRM

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20 IT IS SO ORDERED:



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22 UNITED STATES MAGISTRATE JUDGE

23 Date: April 18, 2014
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