| 1 2 3 4 5 6 7 | ROBERT W. FREEMAN Nevada Bar No. 3062 NOEL E. EIDSMORE Nevada Bar No. 7688 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 City of North Las Vegas, Joseph Chronister, Michael Waller, Drew Albers. David Cawthorn, Eric Rockwell, and Travis Snyder | |
|---------------------------------|--|--|
| 8 | UNITED STATES DISTRICT COURT | |
| 9 | DISTRICT OF NEVADA | |
| 10 | * | ** |
| 11 | ANTHONY MITCHELL, LINDA | CASE NO. 2:13-cv-01154-APG-CWH |
| 12 | MITCHELL, and MICHAEL MITCHELL, Plaintiffs, | STIPULATION AND ORDER TO EXTEND THE TIME TO FILE THE |
| 13 | VS. | REPLY IN SUPPORT OF THE MOTION FOR SUMMARY JUDGMENT |
| 14 | CITY OF HENDERSON, NEVADA; JUTTA | |
| 15 | CHAMBERS, individually and in her capacity as Chief of the Henderson Police Department; | |
| 16 | GARRETT POINER, RONALD FEOLA, RAMONA WALLS, ANGELA WALKER, | |
| 17 | and CHRISTOPHER WORLEY, individually and in their official capacities as Henderson | |
| 18 | police officers; CITY OF NORTH LAS VEGAS, NEVADA; JOSEPH CHRONISTER, | |
| 19 | individually and in his official capacity as Chief of the North Las Vegas Police | |
| 20 | Department; MICHAEL WALLER, DREW ALBERS, DAVID CAWTHORN, ERIC | |
| 21 | ROCKWELL, F/N/U SNYDER, individually and in their official capacities as North Las | |
| 22 | Vegas Police Officers; JANETTE R. REYER- SPEER; DOE individuals 1-40, jointly and | |
| 23 | severally; and ROE CORPORATIONS 1-40 joint and severally, | |
| 24 | | |
| 25 | Defendants. | |
| 26 | | |
| 27 | | |
| 28 | | |
| | | |

LEWIS BRISBOIS BISGAARD & SMITH LLP ATTORNEYS AT LAW

4845-2756-0768.1

STIPULATION AND ORDER TO EXTEND THE TIME TO FILE THE REPLY IN SUPPORT OF THE MOTION FOR SUMMARY JUDGMENT

COMES NOW, Plaintiff and Defendants, by and through their respective counsel of record and hereby stipulate that the scheduled date of filing the Reply in Support of the Motion for Summary Judgment, currently due on Tuesday, January 24, 2017 be extended thirty (30) days up to and including February 23, 2017.

Counsel for the City of North Las Vegas Defendants has been involved in preparing an Ninth Circuit brief in *R. Leung adv. Cooley, 16-16268* and Motions for Summary Judgment in *SFMAIC adv. Kingham, 2:15-cv-1555-APG-GWF* and *LVMPD et al adv. McLaine, 2:14-cv-0288-JAD-GWF*. In addition, counsel for Defendants will be in multi-day deposition in *NLV adv. Donatell, 2:15-cv-2334-RBF-NJK* during late January and February 2017.

This request for extension is made in good faith and not for the purposes of delay.

13 || ...

1

2

3

4

5

6

7

8

9

10

11

12

14 || ...

15 || ...

16 || ...

17 || ...

18 ...

19 || ...

20 || ...

21 || ...

22 || ...

23 ||

24

25 |

. . .

26

27

28 || .

BRISBOIS
BISGAARD
& SMITH LIP
ATTORNEYS AT LAW

4845-2756-0768.1

| 1 | WHEREFORE, the parties respectfully request that the time to file the Reply in Support of | | |
|----|--|---|--|
| 2 | Motion for Summary Judgment be extended an additional thirty (30) days up to and including | | |
| 3 | February 23, 2017. | | |
| 4 | Dated this <u>24th</u> day of January, 2017. | Dated this 24 th day of January, 2017. | |
| 5 | LEWIC DRICHOIC DICCAADD 6 CMTHAIR | DOTTED I AND OFFICE | |
| 6 | LEWIS BRISBOIS BISGAARD & SMITH LLP | POTTER LAW OFFICES | |
| 7 | /s/ Robert W. Freeman Robert W. Freeman, Esq. | /s/ C.J. Potter Col L Potter III For | |
| 8 | Nevada Bar No. 3062 | Cal J. Potter, III, Esq. Nevada Bar No. 1988 | |
| 9 | Noel E. Eidsmore, Esq. Nevada Bar No. 7688 | C.J. Potter, IV, Esq. Nevada Bar No. 13225 | |
| 10 | 6385 S. Rainbow Blvd., Suite 600 | 1125 Shadow Lane | |
| | Las Vegas, Nevada 89118 Attorney for Defendant | Las Vegas, Nevada 89102 Attorneys for Plaintiffs | |
| 11 | City of North Las Vegas | Miorneys for 1 idinigs | |
| 12 | 01 | RDER | |
| 13 | IT IS SO ORDERED. | | |
| 14 | Dated: January 24, 2017. | | |
| 15 | | | |
| 16 | | 01 | |
| 17 | U U | NITED STATES DISTRICT JUDGE | |
| 18 | | | |
| 19 | | | |
| 20 | | | |
| 21 | | | |
| 22 | | | |
| 23 | | | |
| 24 | | | |
| 25 | | | |
| | | | |
| 26 | | | |

27

28

4845-2756-0768.1