

MARQUIS AURBACH COFFING

10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816

1 **Marquis Aurbach Coffing**
2 Craig R. Anderson, Esq.
3 Nevada Bar No. 6882
4 Tye S. Hanseen, Esq.
5 Nevada Bar No. 10365
6 Christian T. Balducci, Esq.
7 Nevada Bar No. 12688
8 10001 Park Run Drive
9 Las Vegas, Nevada 89145
10 Telephone: (702) 382-0711
11 Facsimile: (702) 382-5816
12 canderson@maclaw.com
13 thanseen@maclaw.com
14 cbalducci@maclaw.com
15 Attorneys for

9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 J.D.H., a minor by and through her legal
12 guardian and/or parent, Inocente Dominguez; and
13 MARIA HERNANDEZ, an individual,
14
15 Plaintiffs,

Case No.: 2:13-CV-01300-APG-NJK

14 VS.

15 LAS VEGAS METROPOLITAN POLICE
16 DEPARTMENT; LAS VEGAS
17 METROPOLITAN POLICE DEPARTMENT
18 OFFICER J. BARKER (in his individual
19 capacity); and LAS VEGAS METROPOLITAN
20 POLICE DEPARTMENT OFFICER M.
21 PURCARO (in his individual capacity).

22 Defendants.

23 **STIPULATION AND ORDER TO EXTEND TIME FOR DEFENDANTS TO FILE**
24 **THEIR REPLY IN SUPPORT OF THEIR MOTION FOR SUMMARY JUDGMENT**
25 **(First Request)**

26 Pursuant to LR-6-1, the parties hereby stipulate, agree, and make joint application to
27 extend the deadline for Defendants to file their reply in support of their motion for summary
28 judgment [Dkt. #99] in this matter as follows:

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1 1. The Deadline for the Defendants to submit their reply in support of their motion
2 for summary judgment is presently set for February 18, 2016.

3 2. Defendants’ counsel, Mr. Christian Balducci, reached out to Plaintiffs’ counsel on
4 February 16, 2016 via email, and not long after sending the email and out of an abundance of
5 caution, filed a motion to enlarge/extend time to file the reply in support of the motion for
6 summary judgment on an emergency basis. That motion is presently pending as [Dkt. #112]
7 (“the Motion”).

8 3. In the Motion, Defendants requested an additional 7 calendar days to file their
9 reply due to the items raised in the motion and opposition, namely, the busy schedule of Mr.
10 Balducci (counsel for Defendants), which includes a trial and arbitration, and the lengths of the
11 pleadings.

12 4. Defendants’ counsel and Plaintiffs’ counsel were able to speak after the motion
13 was filed.

14 5. Plaintiffs’ counsel, Ms. Shell, was able to contact Defendants’ counsel later that
15 day and respectfully indicated she had no opposition; which would render the motion to enlarge
16 time [Dkt. #112] moot and warrant that it be denied as such in light of this stipulation.

17 6. Based upon the foregoing, the parties respectfully request that the Court order:
18 a. That the time for Defendants’ reply in support of their motion for
19 summary judgment be extended from February 18, 2016 to February 25,
20 2016; and
21 b. That Defendants’ emergency motion to enlarge/extend time to file reply in
22 support of their motion for summary judgment [Dkt. #112] be denied as
23 moot upon execution by the Court of this stipulation.

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1 7. This is the first joint, stipulated request for enlargement of time for Defendants'
2 reply and is made in good faith and not for the purpose of delay.

3 Dated this 16th day of February, 2016.

Dated this 16th day of February, 2016.

4 MARQUIS AURBACH COFFING

MCLETCHIE SHELL, LLC

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6 By: /s/Christian T. Balducci
7 Craig R. Anderson, Esq.
8 Nevada Bar No. 6882
9 Tye S. Hanseen, Esq.
10 Nevada Bar No. 10365
11 Christian T. Balducci, Esq.
12 Nevada Bar No. 12688
13 10001 Park Run Drive
14 Las Vegas, Nevada 89145
15 Attorney for Defendants

By: /s/Alina Shell
Margaret A. McLetchie, Esq.
Nevada Bar No. 10931
Alina Shell, Esq.
Nevada Bar No. 11711
701 East Bridger Ave., Suite 520
Las Vegas, Nevada 89101

GERSON LAW OFFICE
Phillip S. Gerson, Esq.
Nevada Bar No. 5964
1835 Village Center Circle
Las Vegas, NV 89134
Attorneys for Plaintiffs

ORDER

16 IT IS ORDERED that Defendants' reply in support of their motion for summary
17 judgment [Dkt. #99] in the above-referenced matter is extended to **Thursday February 25,**
18 **2016;**

19 IT IS FURTHER ORDERED that the Defendants' emergency motion to enlarge/extend
20 time pending as [Dkt. #112] be denied as moot as this Stipulation and Order grants the relief
21 sought.

22 February 17, 2016
DATED


UNITED STATES DISTRICT COURT JUDGE