

1 Margaret A. McLetchie, Nevada Bar No. 10931
 2 Alina M. Shell, Nevada Bar No. 11711
 3 MCLETCHIE SHELL LLC
 4 701 East Bridger Ave., Suite 520
 5 Las Vegas, NV 89101
 6 Telephone: (702) 728-5300
 7 Facsimile: (702) 425-8220
 8 Email: maggie@nvlitigation.com
 9 Attorneys for Plaintiff

7 **UNITED STATES DISTRICT COURT**
 8 **DISTRICT OF NEVADA**

9 REGINALD HOWARD,
 10
 11 Plaintiff,
 12
 13 v.
 14 S. FOSTER, et al.,
 15 Defendants.

Case No.: 2:13-cv-01368-RFB-NJK

STIPULATION FOR AN EXTENSION
OF TIME TO SUBMIT PROPOSED
FINDINGS OF FACTS
(First Request)

15 COME NOW, Plaintiff, Reginald Howard, by and through his attorneys, Margaret A.
 16 McLetchie and Alina M. Shell, of the law firm of McLetchie Shell, LLC, along with
 17 Defendants, Aaron Dicus, Sean Bloomfield, and Gustavo Sanchez, by and through their
 18 attorneys, Adam Paul Laxalt and Frank A. Toddre II, of Nevada Attorney General’s Office,
 19 and hereby agree and stipulate to an extension of three weeks to submit simultaneous
 20 proposed findings of fact as identified at the hearing and to provide a WORD doc version to
 21 the courtroom deputy. (see Minute Order, ECF No. 134). The current deadline is June 20,
 22 2018. A three-week extension would make the new deadline for the proposed findings of fact
 23 due on July 11, 2018.

24 This extension is necessary because counsel for Plaintiff has an opposition to an
 25 Emergency Motion for a Writ of Prohibition due on June 18, 2018 in Las Vegas Metropolitan
 26 Police Department v. Eighth Judicial District Court, Nevada Supreme Court Case No.
 27 76023. Counsel for Plaintiff also has an Opposition to a Motion for Summary Judgment due
 28 on June 22, 2018 in Walker, et al. v. City of North Las Vegas, et al., U.S. Dist. Ct. Case No.



1 2:14-cv-01475-JAD-NJK. Counsel for Plaintiff also has a settlement statement due on June
2 22, 2018 in Trost v. Cox, et al., U.S. Dist. Ct. Case No. 3:14-cv-0611-MMD-WGC. Further,
3 on June 29, 2018, counsel for Plaintiff will be in Boise, Idaho for a settlement conference in
4 the Trost matter. Counsel for Defendants in this matter is also counsel for Defendants in
5 Trost and thus has the same deadlines for filing a settlement statement and participating in
6 the settlement conference in that case. Finally, counsel for Plaintiff has an Answering Brief
7 due on July 6, 2018 in Clark County Office of the Coroner/Medical Examiner v. Las Vegas
8 Review-Journal, Nevada Supreme Court Case No. 74604.

9 This Stipulation is not sought for any improper purpose or other purpose of delay,
10 but in the interest of effectively representing Plaintiff’s interests in this matter.

11 IT IS SO STIPULATED.

13 DATED this 15th day of June, 2018.

DATED this 15th day of June, 2018.


14 /s/ Alina M. Shell
15 MARGARET A. MCLETCHIE
16 Nevada Bar No. 10931
17 ALINA M. SHELL
18 Nevada Bar No. 11711
19 MCLETCHIE SHELL, LLC
20 701 East Bridger Ave., Suite 520
21 Las Vegas, NV 89101
22 (702) 728-5300
23 maggie@nvlitigation.com
24 Attorneys for Plaintiff Reginald Howard

/s/ Frank A. Toddre, II
ADAM PAUL LAXALT
Nevada Bar No.12426
FRANK A. TODDRE II
Nevada Bar No. 11474
OFFICE OF THE ATTORNEY GENERAL
Bureau of Litigation – Public Safety Division
555 E. Washington Ave., Suite 3900
Las Vegas, NV 89101
(702) 486-3149
ftoddre@ag.nv.gov
Attorneys for Defendants

ORDER

24 IT IS SO ORDERED.

26 DATED: June 21, 2018


RICHARD F. BOULWARE, II
UNITES STATES DISTRICT JUDGE