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## UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

LIDIA G. JABLONSKI,	Case No. 2:13-cv-01510-JAD-VCF
Plaintiff,	
vs. WAL-MART STORES, INC.,	STIPULATION AND ORDER TO EXTEND THE DEADLINES FOR FILING RESPONSE AND REPLY TO DISPOSITIVE MOTIONS
Defendant.	[FIRST REQUEST]
	[ECF No. 59]

In compliance with Local Rules 6-1 and 26-4, Plaintiff LIDIA G. JABLONSKI ("Plaintiff") and Defendant WAL-MART STORES, INC. ("Defendant"), by and through their attorneys of record, stipulate and agree to extend the time period for Plaintiff Lidia

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Jablonski to file her response to Defendant's Motion for Summary Judgment, which is currently due on May 27, 2016, to be extended to and including **June 27, 2016**. Further, parties also stipulate and agree to extend the time period for Defendant to file its reply to Plaintiff's Response to the Motion for Summary Judgment to and including August 4, 2016. This is the first request for an extension of time.

This stipulation is made for good cause, in good faith, and not for purpose of delay. This stipulation is necessary because counsel for Plaintiff has deadlines in other matters, including a reply in a state post-conviction supplemental petition for a writ of habeas corpus due on May 27, 2016, a reply in support of a motion to intervene in United States v. Bundy, et al., Dist. Ct. Case No. 2:16-cr-00046-GMN-PAL due on May 31, 2016, an evidentiary hearing in a state post-conviction case on June 3, 2016, a hearing on a state post-conviction supplemental petition for a writ of habeas corpus on June 8, 2016, as well as other deadlines in state and federal matters. Additionally, counsel for Defendant has an answering brief due with the United States Court of Appeals for the Ninth Circuit due on July 15, 2016, and has a planned vacation from July 15, 2016, through July 29, 2016.

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This stipulation is also necessary because the parties are engaging in settlement 1 2 conversation. The normal briefing set forth in Local Rule 7-2 will still be applicable. 3 Dated: May 20, 2016. Dated: May 20, 2016. 4 Respectfully submitted, Respectfully submitted, 5 6 /s/ Alina M. Shell /s/ Jamie Chu, Esq. 7 ROGER L. GRANDGENETT II, ESQ. MARGARET A. MCLETCHIE JAMIE CHU, ESQ. LITTLER MENDELSON, P.C. 8 **ALINA SHELL** MCLETCHIE SHELL LLC 9 Attorneys for Plaintiff Attorneys for Defendant 10 LIDIA Ğ. JABLONSKI WAL-MART STORES, INC. 11 12 IT IS SO ORDERED. ATTORNEYS AT LAW
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WWW.NVLITIGATION.COM 13 Dated this \_23rd\_\_ day of \_May\_ 14 2016. 15 Jennifek A. Dorsey 16 United States District Judge 17 18 19 20 21 22 23 24 25 26 27 28