McLaine v. Clark County, Nevada et al Doc. 113

Paul S. Padda, Esq. (NV Bar #10417)
Email: psp@paulpaddalaw.com
PAUL PADDA LAW, PLLC
4240 West Flamingo Road, Suite 220
Las Vegas, Nevada 89103
Tele: (702) 366-1888
Fax: (702) 366-1940

Attorney for the Plaintiff

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA

SHENDONNA SOPHIA McLAINE, **Plaintiff,** **v.** **CLARK COUNTY, NEVADA; *et. al.*,** **Defendants.**	**Case No. 2:14-cv-0288-JAD-GWF**

STIPULATION FOR EXTENSION OF TIME FOR PLAINTIFF TO RESPOND TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT

(FIRST REQUEST)

Pursuant to Federal Rules of Civil Procedure 6(b) and the Court's Local Rule of Civil Practice ("LRCP") 7-1, the parties respectfully request that the Court extend the current deadline for Plaintiff to respond to Defendants' motions for summary judgment (Pacer #109 and #110) to and until April 3, 2017. This is the parties' first request for an extension of the current deadline of February 20, 2017.

In support of this stipulation, the parties wish to advise the Court of the following:

1. This is a civil rights case involving five separate Defendants. Each Defendant moved for summary judgment on January 30, 2017.

. . .

Dockets.Justia.com

2. Plaintiff's counsel has requested counsel for Defendants agree to this stipulation based upon his current trial/work schedule and the need to devote sufficient time to preparing responses to Defendants' dispositive motions. In support of this request, Plaintiff's counsel cites the fact that he has two major civil trials (both on firm trial settings) commencing in the Clark County District Court in March 2017 – David Moradi v. Nevada Property 1, LLC, et. al.,[1] and Jack Gurian v. Atria Property Management, et. al.,[2] The Gurian trial is expected to span ten days and the Moradi trial is expected to span six weeks. In preparation for both of these trials, Plaintiff's counsel has been required to respond to approximately 50 separate motions *in limine* and numerous other pretrial motions. A motions hearing was held in the Moradi case on February 17, 2017 which required significant preparation in advance. In light of the foregoing, and the work that will be required of Plaintiff's counsel, the next two months will be exceeding busy. Having considered his work schedule and the responses that need to be prepared in opposition to each Defendant's motion for summary judgment, undersigned counsel for Plaintiff believes an extension of time until April 3, 2017 will be necessary in order to provide him sufficient time to prepare the appropriate responses.

3. Counsel for Defendants do not oppose Plaintiff's request for additional time to respond to the dispositive motions provided they are allowed 30-days to file a reply to any response that may be filed by Plaintiff.

. . .

. . .

. . .

. . .

---

[1] Case No. A-14-698824-C.

[2] Case No. A-14-704011-C.

4. The parties respectfully request that the Court approve this stipulation.

Respectfully submitted,

/s/ Lucinda L. Coumou

Lucinda L. Coumou, Esq.
Chief Deputy District Attorney, Civil Division
Clark County District Attorney's Office

Attorney for Defendant Clark County, Nevada

Dated: February 19, 2017

/s/ Paul S. Padda

Paul S. Padda, Esq.
Paul Padda Law

Attorney for Plaintiff

Dated: February 19, 2017

/s/ Noel E. Eidsmore

Robert W. Freeman, Jr., Esq.
Noel E. Eidsmore, Esq.
Lewis Brisbois Bisgaard & Smith

Attorney for Officers Friedman and Zaccara
and the Las Vegas Metropolitan Police Department

Dated: February 19, 2017

IT IS SO ORDERED:

The Court hereby approves the parties' stipulation for extension of the current deadline for responding to the motions for summary judgment filed on January 30, 2017 (Pacer #109 and #110). Plaintiff's responses shall be due on or before April 3, 2017 and each Defendant shall have 30-days after Plaintiff files a response to submit a reply (if any).

UNITED STATES DISTRICT JUDGE
Dated: February 21, 2017.