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## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA

SHENDONNA SOPHIA McLAINE, Plaintiff,	) ) ) ) Case No. 2:14-cv-0288-JAD-GWF
v.	<b>}</b>
CLARK COUNTY, NEVADA; et. al.,	<b>)</b>
Defendants.	

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

(SECOND 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 18, 2017 (Tuesday). This is the parties' second request for an extension of time. Plaintiff's current deadline is April 3, 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.

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proceedings is required.

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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 been in trial since March 20, 2017 in David Moradi v. Nevada

Property 1, LLC, et. al., Clark County District Court (case number A-14-698824-C). Trial in that

Counsel for Defendants do not oppose Plaintiff's request for additional time to

The additional time requested herein should provide sufficient time for Plaintiff's

matter is ongoing and expected to last approximately two more weeks. Although undersigned

counsel is not the sole attorney representing Plaintiff in the Moradi case, his presence at trial

respond to the dispositive motions provided they are allowed 30-days to file a reply to any

no issue with providing Defendants additional time to file replies.

counsel to complete and file an appropriate response.

response that may be filed by Plaintiff. Obviously, given his own request, Plaintiff's counsel has

1	5. The parties respectfully request that the Court approve this stipulation.	
2		Respectfully submitted,
3	/s/ Lucinda L. Coumou	/s/ Paul S. Padda
4 5	Lucinda L. Coumou, Esq. Chief Deputy District Attorney, Civil Division Clark County District Attorney's Office	Paul S. Padda, Esq. Paul Padda Law
6	Attorney for Defendant Clark County, Nevada	Attorney for Plaintiff
7	Dated: April 3, 2017	Dated: April 3, 2017
8 9 10	/s/ Noel E. Eidsmore  Robert W. Freeman, Jr., Esq. Noel E. Eidsmore, Esq. Lewis Brisbois Bisgaard & Smith	
11 12	Attorney for Officers Friedman and Zaccara and the Las Vegas Metropolitan Police Department	
13	Dated: April 3, 2017	
14	IT IS SO ORI	DERED:
15		reby approves the parties' stipulation for the current deadline for responding to the
16	motions for su 2017 (Pacer #1	mmary judgment filed on January 30, 09 and #110). Plaintiff's responses shall
17 18	shall have 30-c	efore April 18, 2017 and each Defendant days after Plaintiff files a response to
19	submit a reply	(n any).
20	UNITED STA Dated: April 4,	TES DISTRICT JUDGE 2017,
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