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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.	ECF No. 116
CLARK COUNTY, NEVADA; et. al.,	
Defendants.	}

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

(THIRD 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 May 19, 2017 (Friday). This is the parties' third request for an extension of time. Plaintiff's current deadline is April 18, 2017.

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

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

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- 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 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 matter, a complex case involving a traumatic brain injury, is ongoing and expected to conclude this Friday (April 21, 2017) with closing arguments likely to occur on Monday (April 24, 2017). Although undersigned counsel is not the sole attorney representing Plaintiff in the Moradi case, his presence at trial proceedings is necessary and required.
- 3. In the midst of the foregoing, counsel for Plaintiff has also advised that a client of his was just recently indicted on federal charges this past week and is expected before this Court tomorrow for his initial appearance. *See* <u>United States v. David Nakama Oancea</u>, 2:17-cr-0116-JAD-CWH. The case has generated significant publicity and counsel for Plaintiff was required to unexpectedly devote significant time this past week to various aspects of the case.
- 4. 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. Obviously, given his own request, Plaintiff's counsel has no issue with providing Defendants additional time to file replies.
- 5. The additional time requested herein should provide sufficient time for Plaintiff's counsel to complete and file an appropriate response. In fact, Plaintiff's counsel is requesting a 30-day extension with the expectation that this will be more than sufficient time to complete responses in this matter despite any unexpected developments that may arise in other cases similar to what has recently occurred.

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1	6. 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		Paul S. Padda, Esq. Paul Padda Law	
6	Clark County District Attorney's Office		Attorney for Plaintiff	
7	Attorney for Defendant Clark County, Nevada Dated: April 18, 2017		Dated: April 18, 2017	
8	Dated. April 16, 2017			
9	/s/ Noel E. Eidsmore			
10	Robert W. Freeman, Jr., Esq. Noel E. Eidsmore, Esq.			
11	Lewis Brisbois Bisgaard & Smith			
12	Attorney for Officers Friedman and Zaccara and the Las Vegas Metropolitan Police Department			
13	Dated: April 18, 2017			
14	IT IS SO ORDERED:			
15	The Court hereby approves the parties' stipulation for extension of the current deadline for responding to the			
16	r	notions for summar	y judgment filed on January 30, d #110). Plaintiff's responses shall	
17			May 19, 2017 and each Defendant fter Plaintiff files a response to	
18	s	submit a reply (if an	y).	
19	-	XX	0845	
20		UNITED STATES I Dated: April19		
21	I	Dated: April	, 2017	
22				
23 24				
25				

CERTIFICATE OF SERVICE

In compliance with the Court's Local Rules, the undersigned hereby certifies that on April 18, 2017 a copy of the foregoing document, "STIPULATION FOR EXTENSION OF TIME FOR PLAINTIFF TO RESPOND TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT" was served (via the Court's CM/ECF system) upon all counsel of record in this litigation.

/s/ Paul S. Padda

Paul S. Padda, Esq.