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4	Tele: (702) 366-1888 Fax: (702) 366-1940
5	Attorney for the Plaintiff
6	UNITED STATES DISTRICT COURT
7	FOR THE DISTRICT OF NEVADA
8	I ON THE DISTRICT OF NEVADA
9	SHENDONNA SOPHIA McLAINE,
10	Plaintiff,
11	V.
12	CLARK COUNTY, NEVADA; et. al.,
13	Defendants.
14)
15	STIPULATION FOR EXTENSION OF TIME FOR PLAINTIFF TO RESPOND TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT
16	(FOURTH REQUEST)
17	
18	Pursuant to Federal Rules of Civil Procedure 6(b) and the Court's Local Rule of
19	Civil Practice ("LRCP") 7-1, the parties respectfully request that the Court extend the current
20	deadline for Plaintiff to respond to Defendants' motions for summary judgment (Pacer #109 and
21	#110) to and until May 23, 2017 (Tuesday). This is the parties' fourth request for an extension of
22	time. Plaintiff's current deadline is May 19, 2017.
23	In support of this stipulation, the parties wish to advise the Court of the following:
24	1. This is a civil rights case involving five separate Defendants. Each
25	Defendant moved for summary judgment on January 30, 2017.
26	

1	2. Plaintiff's counsel recently completed a 7-week jury trial in state court that
2	required a significant amount of his time and detracted from his ability to complete responses to
3	the pending motions for summary judgment. While Plaintiff's counsel has commenced drafting
4	responses and made significant progress towards their completion, an additional 2-business days
5	will permit him to complete and file appropriate responses. To this end, undersigned counsel
6	will work over the weekend to ensure their completion and avoid any further extensions of time.
7	3. Counsel for Defendants do not oppose Plaintiff's request for additional
8	time to respond to the dispositive motions provided they are allowed 30-days to file a reply to
9	any response that may be filed by Plaintiff. Obviously, given his own request, Plaintiff's counsel
10	has no issue with providing Defendants additional time to file replies.
11	4. The additional time requested herein should provide sufficient time for
12	Plaintiff's counsel to complete and file appropriate responses.
13	5. The parties respectfully request that the Court approve this stipulation.
14	Respectfully submitted,
15	/s/Lucinda L. Coumou /s/Paul S. Padda
16 17	Lucinda L. Coumou, Esq.Paul S. Padda, Esq.Chief Deputy District Attorney, Civil DivisionPaul Padda LawClark County District Attorney's OfficePaul Padda Law
18	Attorney for Defendant Clark County, Nevada
10	Dated: May 19, 2017
20	Dated. May 19, 2017
21	/s/ Noel E. Eidsmore
22	Robert W. Freeman, Jr., Esq. Noel E. Eidsmore, Esq.
23	Lewis Brisbois Bisgaard & Smith
24	Attorney for Officers Friedman and Zaccara and the Las Vegas Metropolitan Police Department
25	Dated: May 19, 2017
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1	IT IS SO ORDERED:
2	The Court hereby approves the parties' stipulation for
3	extension of the current deadline for responding to the motions for summary judgment filed on January 30,
4	2017 (Pacer #109 and #110). Plaintiff's responses shall be due on or before May 23, 2017 and each Defendant
5	shall have 30-days after Plaintiff files a response to submit a reply (if any).
6	Arcent
7	UNITED STATES DISTRICT JUDGE
8	Dated: May, 2017
9	
10	CERTIFICATE OF SERVICE
11	In compliance with the Court's Local Rules, the undersigned hereby certifies that on May 19, 2017 a copy of the foregoing document, "STIPULATION FOR EXTENSION OF TIME FOR
12	PLAINTIFF TO RESPOND TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMEN was served (via the Court's CM/ECF system) upon all counsel of record in this litigation.
13	/s/ Paul S. Padda
14	Paul S. Padda, Esq.
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