20

21

22

23

24

25

26

27

28

1 2 3 4 5	JAMES E. HARPER, ESQ. Nevada Bar No.: 9822 HARPER LAW GROUP 1935 Village Center Circle Las Vegas, Nevada 89134 Ph.: (702) 948-9240 Fax: (702) 778-6600 E-Mail: eservice@harperlawlv.com	
6	Attorney for Defendant	
7	UNITED STATES DISTRICT COURT	
8	DISTRICT OF NEVADA	
9		
10	JILL COOK,	CASE NO.: 2:14-cv-00524-RFB-PAL
11	Plaintiff,	
13	vs.	STIPULATION AND ORDER TO CONTINUE HEARING ON PLAINTIFF'S
14	STATE FARM MUTUAL AUTOMOBILE	MOTION TO COMPEL DEFENDANT STATE FARM'S RESPONSES TO
15	INSURANCE COMPANY; and DOES I	PLAINTIFF'S FIRST SET OF
16	through X, inclusive,	INTERROGATORIES AND FIRST SET OF REQUESTS FOR PRODCUTION OF
17	Defendants.	DOCUMENTS AND REQUEST FOR SANCTIONS
18		
19		(First Request)
17		

Defendant STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY ("State Farm") by and through its attorney, HAPRER LAW GROUP, and Plaintiff JILL COOK, by and through her attorneys, PRINCE | KEATING, hereby submit this Stipulation and Order to Continue Hearing on Plaintiff's Motion to Compel Defendant State Farm's Responses to Plaintiff's First Set of Interrogatories and First Set of Requests for Production of Documents and Request for Sanctions (Doc. # 27) pursuant to LR 6-2 and 7-1.

On January 21, 2105, this Court issued an order setting the hearing on Plaintiff's Motion for March 3, 2015 at 10:00 a.m. (Doc. # 28). On that date, counsel for State Farm will be out of the

3	
4	
5	
6	
7	
8	
9	
10	
11	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27 28	

country on a pre-planned family vacation to Cape Town, South Africa to celebrate his grandmother's 100^{th} birthday. As such, the date set for this hearing should, respectfully, be re-set for February 26, 2015 at 10:00 am. This is the parties' first request to reschedule the hearing, and is not made for an improper purpose or to unnecessarily frustrate the proceedings or Court's schedule.

DATED this 30th day of January 2015.

DATED this 30th day of January 2015.

PRINCE | KEATING

HARPER LAW GROUP

DENNIS M. PRINCE Nevada Bar No. 5092 CHRISTINA M. MAMER Nevada Bar No. 13181 9130 West Russell Road, Ste. 200 Las Vegas, NV 89148

JAMES E. HARPER Nevada Bar No. 9822 1935 Village Center Circle Las Vegas, NV 89134

Attorney for Defendant

Attorneys for Plaintiff

<u>ORDER</u>

IT IS SO ORDERED.

DATED: February 2, 2015

UNITED STATES MAGISTRATE JUDGE