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13
14 **UNITED STATES DISTRICT COURT**
15 **DISTRICT OF NEVADA**

16 STEVEN DELOSH,

17 Plaintiff,

Case No.: 2:14-cv-00632-APG-GWF

18 vs.

19 STATE OF NEVADA DIVISION OF
PRISONERS, a Subdivision of the State of
20 Nevada; STATE OF NEVADA
DEPARTMENT OF CORRECTIONS, a
21 subdivision of the State of Nevada; JAMES
"GREG" COX, Director, Nevada
22 Department of Corrections; ROBERT
BANNISTER, D.O., individually and in his
23 capacity as Medical Director of the Nevada
Department of Corrections; DWIGHT
24 NEVEN, individually and in his capacity as
Warden of High Desert State Prison; PA
25 GREGORY MARTIN, individually and in
his capacity as Medical Officer of High
26 Desert State Prison; PA GARY GRAHAM,
individually and in his capacity as Medical
27 Officer of High Desert State Prison; MARY
EATON, R.N., individually and in her
28 capacity as Chief Nursing Officer of Nevada

STIPULATION AND ORDER TO
EXTEND PLAINTIFF'S RESPONSES
TO DEFENDANTS' MOTION TO
DISMISS AND MOTION FOR
SUMMARY JUDGMENT
(First Request)

1 Department of Corrections; DR. ROMEO
2 ARANAS, individually and in his capacity
3 as a Senior Physician for the State of
4 Nevada; Corrections Officer MICHAEL
5 RAMOS, individually; Corrections Officer
6 RANDOLPH MOYE, individually; and
7 DOES 1 through 30 and ROE
CORPORATIONS 1through 30; DOE
PHYSICIANS 1 through 30; DOE NURSES
1 through 30; DOE CORRECTIONS
OFFICERS 1 through 30; DOE EMPLOYEES
1 through 30; and ROE THIRD PARTY
CONTRACTORS 1 through 30, inclusive,

8 Defendants.

9 _____ /

10 **STIPULATION AND ORDER TO EXTEND PLAINTIFF’S RESPONSES TO**
11 **DEFENDANTS’ MOTION TO DISMISS AND**
12 **MOTION FOR SUMMARY JUDGMENT**

13 **(First Request)**

14 Pursuant to LR 6-1, Plaintiff, STEVEN DELOSH, by and through his counsel of record
15 Michael C. Kane, Esq. of The 702 Firm and Cal J. Potter, III, Esq. and C. J. Potter, IV, Esq. of
16 Potter Law Offices and Defendants, named above, by and through their counsel of record,
17 Andrea R. Barraclough, Deputy Attorney General, hereby stipulate and request that the
18 scheduled date of filing of Plaintiff’s Responses to Defendants’ Motion to Dismiss [doc. 42]
19 and Motion for Summary Judgment [doc. 43] currently due on Monday, May 4, 2015 be
20 extended fourteen (14) days, up to and including Monday, May 18, 2015.

21 Plaintiff submits that good cause exists for this extension as Plaintiff is in the process of
22 retaining and associating Cal J. Potter, III, Esq. and C. J. Potter, IV, Esq. as co-counsel in this
23 matter, but at the present time, Potter Law Offices has not had sufficient time to review this
24 matter and/or prepare the appropriate responses.

25 Based upon the foregoing, the parties request that this Court order the time for the
26 Plaintiff to file his Responses to Defendants’ Motion to Dismiss [doc. 42] and Motion for
27 Summary Judgment [doc. 43] to Monday, May 18, 2015. The parties also request that this
28 Court provide a concomitant enlargement of time for the Defendants’ Reply thereto.

1 This is the first request for enlargement of time to file the Response and first request for
2 enlargement of time to file the Responses. This request is made in good faith and not for the
3 purposes of delay.

4 APPROVED AS TO FORM AND CONTENT.

5 DATED this 4th day of May, 2015. DATED this 7th day of April, 2015.
6 THE 702 FIRM OFFICE OF THE ATTORNEY GENERAL
7 POTTER LAW OFFICES ADAM PAUL LAXALT

8 By: /s/ C. J. Potter, IV, Esq. By Andrea R. Barraclough
9 MICHAEL C. KANE ANDREA R. BARRACLOUGH, Dep. Attny. Gen.
10 Nevada Bar No. 10096 Nevada Bar No. 9158
11 400 S. Seventh Street, Suite 400 Bureau of Litigation, Public Safety Division
12 Las Vegas, Nevada 89101 100 N. Carson Street
13 *Attorney for Plaintiff* Carson City, NV 89701-4717
14 *Attorneys for Defendants*

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17 Las Vegas, Nevada 89102
18 *Limited Appearance Attorneys*
19 *for Plaintiff*

20 **ORDER**

21 IT IS SO ORDERED.
22 Dated this 8 day of May, 2015.

23 
24 _____
25 U.S. DISTRICT COURT JUDGE