

1 SAO  
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 9 Attorney for Plaintiffs

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11 UNITED STATES DISTRICT COURT  
 12 DISTRICT OF NEVADA

13 J.M. and I.M., minors by and through their natural  
 14 parent and guardian, JESSICA HARGROVE,

CASE NO.: 2:14-cv-01197-JAD-NJK

15 Plaintiffs,

16 vs.

17 ANDREA HERNANDEZ; WALDO  
 18 HERNANDEZ; ANITA MOODY; LISA  
 19 BROCHU; KIM KALLAS; LISA RUIZ-LEE;  
 20 PAULA HAMMACK; DOE Individuals I-X;  
 21 ROE CLARK COUNTY DEPARTMENT OF  
 22 FAMILY SERVICES EMPLOYEES XI-XX,  
 23 individually and in their official capacities;  
 24 COUNTY OF CLARK, a political subdivision of  
 25 the State of Nevada; and ZOE CORPORATIONS  
 26 XXI-XXX,

27 Defendants.

28 **STIPULATION AND PROPOSED ORDER TO EXTEND DUE DATE FOR PLAINTIFF'S  
 RESPONSE TO DEFENDANTS KIM KALLAS, LISA RUIZ-LEE, PAULA HAMMACK,  
 AND COUNTY OF CLARK'S MOTION TO COMPEL PLAINTIFF TO APPEAR FOR  
 DEPOSITION (FIRST REQUEST)**

Pursuant to LR 7-1 and 7-2, the parties, by and through their respective counsel of record,  
 hereby stipulate and agree to extend the due date for Plaintiffs' response to Defendants' Motion to  
 Compel Jessica Hargrove to Appear for Deposition from October 18, 2015 to October 23, 2015,

1 and respectfully request that this Court approve this stipulation and enter an Order reflecting the  
2 same. This extension has become necessary due to scheduling conflicts arising from Plaintiff's  
3 counsel's trial calendar.

4 DATED this 19th day of October, 2015.

DATED this 19th day of October, 2015.

5 GANZ & HAUF

OLSON CANNON GORMLEY ANGULO &  
STOBERSKI

6  
7 /s/ Cara Xidis, Esq.

/s/ Felicia Galati, Esq.

8  
9 MARJORIE HAUF, ESQ.  
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10 CARA XIDIS  
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FELICIA GALATI, ESQ.  
Nevada Bar No. 7341  
9950 W. Cheyenne Avenue  
Las Vegas, NV 89129  
Attorney for Defendants, Anita Moody, Kim  
Kallas, Lisa Ruiz-Lee, Paula Hammack, and  
County of Clark

**ORDER**

This matter having been stipulated to by the parties, through their respective counsel, and  
the Court being otherwise duly advised;

IT IS HEREBY ORDERED that the due date for Plaintiff's response to Defendants Kim  
Kallas, Lisa Ruiz-Lee, Paula Hammack, and County of Clark's Motion to Compel Plaintiff to  
Appear for Deposition to be extended from October 18, 2015 to October 23, 2015.

DATED: October 20, 2015

  
UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

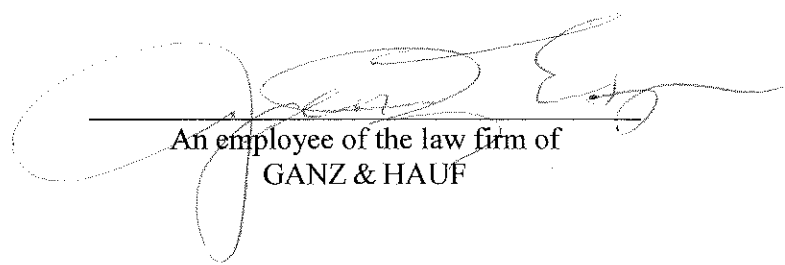
Pursuant to FRCP 5, I certify that on this date, I served the foregoing STIPULATION AND PROPOSED ORDER TO EXTEND DUE DATE FOR PLAINTIFF'S OPPOSITION TO DEFENDANTS KIM KALLAS, LISA RUIZ-LEE, PAULA HAMMACH AND COUNTY OF CLARK'S MOTION TO COMPEL PLAINTIFF TO APPEAR FOR DEPOSITION through the CM/ECF system of the United States District Court for the District of Nevada, upon the following:

FELICIA GALATI, ESQ.  
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*Attorney for Defendants, Hernandez*

Dated this 19 day of October, 2015.

  
An employee of the law firm of  
GANZ & HAUF