

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

1
2
3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 PAT CLARK, JR., individually, as Executor of the
Estate of Bernice Clark, as Trustee of the Pat Clark,
7 Jr. Separate Property Trust, as Trustee of the Pat
Clark Voting Stock Trust, as Trustee of the Pat Clark
8 GST Trust, as Trustee of the Pat Clark Issue Trust, as
Trustee of the Bernice Clark Retained Annuity Trust
9 #2, and as Trustee of the Bernice Clark 2000
Retained Annuity Trust; BARBARA C. KLASSEN,
10 individually, as Trustee of the Barbara C. Klassen
Legacy Trust, and as Trustee of the Clark Ranch
11 House Trust; JOANN CALLAHAN a/k/a JOANN P.
CLARK, individually, as Trustee of the Joann Clark
12 Legacy Trust, and as Trustee of the Clark Ranch
House Trust; MARY LOUISE HOUSTON,
13 individually, as Trustee of the Saucer 5 Legacy Trust,
and as Trustee of the Clark Ranch House Trust;
14 ALAN GREEN, as Trustee of the Houston
Irrevocable Trust; KIMBERLY WASSERBURGER
15 KOUBA; C.R. CLARK; RORY CLARK; and
DANIEL T. CALLAHAN,

16 Defendants.

17
18 AND ALL RELATED CLAIMS.
19

Case No. 2:14-cv-01372-JAD-PAL

**STIPULATION EXTENDING THE
CASE DEADLINES**

(First Request)

STIPULATION EXTENDING THE CASE DEADLINES

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21 Pursuant to Local Rule 6-1, and the Federal Rules of Civil Procedure, the Parties hereby
22 acknowledge their stipulation and agreement to extend the following deadlines:

- 23 1. As set forth in the Scheduling Order (Doc. 28) entered by the Court the following
24 deadlines are currently in effect:

25 Discovery Cut-Off Date: June 5, 2015

26 Rebuttal Expert Disclosures: May 6, 2015

27 Dispositive Motions: July 6, 2015
28

1 Pretrial Order: August 5, 2015 (In the event dispositive motions are
2 filed the date for filing the joint pretrial order shall be suspended until thirty (30) days
3 after decision of the dipositive motion or further order of the court.)

4 2. The parties have been actively engaging in discovery in this matter. The parties
5 have exchanged initial disclosures pursuant to Fed.R.Civ.P. 26-1, served interrogatories and
6 requests for production of documents and designated expert witnesses.

7 3. The Parties collectively desire to extend the current deadlines set forth above by
8 approximately 100 days , so that the parties can engage in settlement negotiations and if necessary
9 a court imposed settlement conference before incurring any additional litigation costs.
10 Specifically, the parties hereby respectfully request that the Court amend the Scheduling Order as
11 follows:

- 12 4. Discovery Cut-Off Date: September 15, 2015
- 13 5. Rebuttal Expert Disclosures: June 8, 2016
- 14 6. Dispositive Motions: October 15, 2015
- 15 7. Pretrial Order: November 16, 2015 (In the event dispositive
16 motions are filed, the date for filing the proposed joint pre-trial order shall be suspended until
17 thirty (30) days after decision of the dispositive motion or further order of the court.)

18 8. The Parties state that this stipulation is made in good faith and not for purposes of
19 delay.

20 RESPECTFULLY SUBMITTED this 1st day of May, 2015.

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9 Clark Ranch House Trust, Joann Callahan
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11 Trustee of the Joann Clark Legacy Trust, and
12 as Trustee of the Clark Ranch House Trust,
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Trust, as Trustee of the Pat Clark GST Trust,
as Trustee of the Pat Clark Issue Trust, as
Trustee of the Bernice Clark Retained Annuity
Trust #2, and as Trustee of the Bernice Clark
2000 Retained Annuity Trust

IT IS SO ORDERED:


U.S. DISTRICT/MAGISTRATE JUDGE

DATED: May 12, 2015