

1 ROBERT W. FREEMAN  
 Nevada Bar No. 3062  
 2 LEWIS BRISBOIS BISGAARD & SMITH LLP  
 6385 S. Rainbow Boulevard, Suite 600  
 3 Las Vegas, Nevada 89118  
 702.893.3383  
 4 Fax: 702.893.3789  
 Attorneys for Defendants  
 5 City of North Las Vegas,  
 Officer Paul Maalouf and Officer Travis Snyder

6  
 7 **UNITED STATES DISTRICT COURT**  
 8 **DISTRICT OF NEVADA**

9  
 10 THOMAS WALKER, an individual, and  
 CATHY CATALDO, an individual,

11 Plaintiffs,

12 vs.

13 CITY OF NORTH LAS VEGAS, OFFICER  
 PAUL MAALOUF, individually and in his  
 14 official capacity as a North Las Vegas Police  
 Department Officer, OFFICER TRAVIS  
 15 SNYDER, individually and in his official  
 capacity as a North Las Vegas Police  
 16 Department Officer,

17 Defendants.

CASE NO. 2:14-cv-01475-JAD-NJK

**STIPULATION AND ORDER TO  
 EXTEND THE DEADLINES FOR THE  
 PARTIES TO FILE THEIR OPPOSITIONS  
 TO MOTIONS FOR SUMMARY  
 JUDGMENT**

**FIRST REQUEST**

18  
 19 Pursuant to LR 6-1 and LR 26-4, the parties, by and through their respective counsel of  
 20 record, hereby stipulate and request that this Court extend the deadline to file the oppositions to  
 21 motions for summary judgment in the above-captioned case thirty-two (32) days, up to and  
 22 including May 7, 2018.

23 This Request for an extension of time is not sought for any improper purpose or other  
 24 purpose of delay. This request for extension is based upon the following:

25 Counsel for defendants has been occupied with preparing an reply brief in *Bryant v.*  
 26 *Donohue*, 2:16-cv-1172-GMN-PAL. In addition, the defendants have been occupied in preparing  
 27 reply briefs in *Mitchell v. City of North Las Vegas*, 17-16552, and *Weathers v. Loumakis*, 17-  
 28 17074.

1 Counsel for plaintiffs has an Answering Brief and Supplemental Excerpts of Records due  
2 on April 4, 2018 in *J.D.H. v. Las Vegas Metropolitan Police Department*, Ninth Circuit Case No.  
3 17-16512. Plaintiffs' counsel also has a competing deadline to file a Special Motion to Dismiss  
4 Pursuant to Nev. Rev. Stat. § 41.660 (anti-SLAPP) in *Hartfield v. Office of Clark County Coroner*,  
5 Eighth Judicial District Court Case No. A-18-768781-C.

6 Counsel for the parties have met and conferred on this topic and have agreed that, to best  
7 serve the interests of the parties and obviate the potential for future motion practice, the most  
8 efficient remedy is to reasonably extend the dispositive motion deadline for both parties.

9 ...  
10 ...  
11 ...  
12 ...  
13 ...  
14 ...  
15 ...  
16 ...  
17 ...  
18 ...  
19 ...  
20 ...  
21 ...  
22 ...  
23 ...  
24 ...  
25 ...  
26 ...  
27 ...  
28 ...

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

WHEREFORE, the parties respectfully request that this Court extend the time for the parties to file their oppositions to motions for summary judgment by thirty-two (32) days from the current deadline of April 5, 2018 up to and including May 7, 2018.

DATED this 2<sup>nd</sup> day of April, 2018.

DATED this 2<sup>nd</sup> day of April, 2018.

LEWIS BRISBOIS BISGAARD & SMITH

MCLETCHIE SHELL

/s/ Robert W. Freeman

/s/ Margaret A. McLetchie

Robert W. Freeman, Jr., Esq.  
Nevada Bar No. 3062  
6385 S. Rainbow Blvd., Suite 600  
Las Vegas, Nevada 89118  
*Attorneys for Defendants*

Margaret A. McLetchie, Esq.  
Nevada Bar No. 10931  
Alina M. Shell, Esq.  
Nevada Bar No. 11711  
701 East Bridger Avenue  
Suite 520  
Las Vegas, Nevada 89101  
*Attorneys for Plaintiffs*

*and*

MAUPIN, NAYLOR BRASTER  
Jennifer K. Braster, Esq.  
Nevada Bar No. 9982  
1050 Indigo Drive, Suite 110B  
Las Vegas, Nevada 89145  
*Attorneys for Plaintiffs*

**ORDER**

IT IS SO ORDERED.

Dated: April 2, 2018.

  
\_\_\_\_\_  
U.S. DISTRICT COURT JUDGE