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

10 VIVIAN WRIGHT-BOLTON;

CASE NO.: 2:14-cv-01612-APG-PAL

11 Plaintiff,

12 v.

13 MELANIE ANDRESS-TOBIASSON,
individually; THE ESTATE OF JENNIFER
14 BOLTON deceased; KOCKA & BOLTON,
LLC, a Nevada Limited Liability Company;

15 Defendants.
16 _____/

17 **STIPULATION AND ORDER TO EXTEND PLAINTIFF'S RESPONSE AND**
18 **DEFENDANT'S REPLY TO DEFENDANT MELANIE ANDRESS-TOBIASSON'S**
19 **MOTION FOR SUMMARY JUDGMENT**

20 IT IS HEREBY STIPULATED AND AGREED, by and between the Plaintiff, VIVIAN
21 WRIGHT-BOLTON, by and through her counsel, CAL J. POTTER, III, ESQ. and C. J.
22 POTTER, IV, ESQ. of POTTER LAW OFFICES and Defendant, MELANIE ANDRESS-
23 TOBIASSON, by and through her counsel WALTER R. CANNON, ESQ. and THOMAS D.
24 DILLARD, JR, ESQ. of OLSON CANNON GORMLEY & STOBERSKI that the date for
25 Plaintiff's Response to Defendant's Motion for Summary Judgment [doc. 13] currently due
26 Thursday, March 19, 2015 be extended two (2) weeks up to and including Thursday, April 2,
27 2015. The parties also request that the Defendant's Reply thereto be extended to April 20,
28 2015.

1 Plaintiff submits that good cause exists for this extension as Plaintiff's counsel has been
2 unable to complete the Response due to other deadlines, numerous appearances, and multiple
3 depositions. Based upon the foregoing, the parties request that this Court order the time for the
4 Plaintiff to file her Response to Defendant's Motion for Summary Judgment [doc. 13] to
5 Thursday, April 2, 2015 and that Defendant's Reply be extended to April 20, 2015.

6 This is the first request for enlargement of time is made in good faith and not for the
7 purposes of delay.

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9 DATED this 19th day of March, 2015.

DATED this 19th day of March, 2015.

10 POTTER LAW OFFICES

OLSON, CANNON, GORMLEY,
ANGULO & STOBERSKI

11 By /s/ C. J. Potter, IV, Esq.
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By /s/ Thomas D. Dillard, Jr., Esq.
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Las Vegas, NV 89129
*Attorney for Defendant Melanie
Andress-Tobiasson*

19 **ORDER**

20 It is so Ordered.

21 March 20, 2015

22 DATED


23 _____
24 U.S. DISTRICT COURT JUDGE
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