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10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**
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13 JACQUELYNN NICKLER,
14 Plaintiff,
15 v.
16 COUNTY OF CLARK, et al.,
17 Defendants.

Case No.: 2:14-cv-01907-APG-CWH
**STIPULATION AND ORDER FOR
EXTENSION OF TIME FOR
DEFENDANTS STEVE GRIERSON,
KATHLEEN LAMBERMONT, AND
CLARK COUNTY TO FILE THEIR
REPLY BRIEFS IN SUPPORT OF
THEIR MOTIONS' TO DISMISS FROM
NOVEMBER 1, 2019 TO NOVEMBER 8,
2019**

(First Request for Extension)

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21 COME NOW the parties, by and through their undersigned counsel of record and
22 hereby stipulate and agree that the time for Defendants Steve Grierson, Kathleen
23 Lambermont and Clark County to file a reply brief in support of Grierson's Motions' to
24 Dismiss or for Summary Judgment and Lambermont and Clark County's joinder to those
25 motions (ECF Nos. 96, 99) shall be extended from November 1, 2019 to November 9, 2019.
26 This is Defendants' first request for an extension of time to file their respective reply briefs.

27 This one-week extension of time to file reply briefs is being sought for the following
28 good faith reasons:

1 First, Plaintiff's Opposition was filed on October 25, 2019, which was a state holiday.
2 As a result, the Office of the Attorney General's office was closed. Further, Grierson's
3 counsel was travelling for the holiday, and was not able to review the opposition until
4 Monday, October 28, 2019 upon returning to the office following the Nevada Day holiday.

5 Second, Nickler's Opposition to the Motion to Dismiss (ECF No. 105) is identical to
6 the Opposition filed to the Motion for Summary Judgment (ECF No. 104), as the Motion
7 for Summary Judgment filed by Grierson (ECF No. 97) was identical to the Motion to
8 Dismiss (ECF No. 96). Similarly, the joinders filed by Defendants Lambermont and Clark
9 County (ECF Nos. 99, 100) were identical as well.

10 Accordingly, the reply brief filed in support of the Motion to Dismiss will be identical
11 to the reply brief filed in support of the Motion for Summary Judgment, which is not due
12 until Friday, November 8, 2019. By extending the deadline to November 8, 2019,
13 Defendants will be afforded the full opportunity to respond to the Motion for Summary
14 Judgment, as opposed to having to complete the reply within seven (7) days.

15 Third, because the reply brief in support of the Motion to Dismiss will be the identical
16 document to the reply brief filed in support of the Motion for Summary Judgment (as each
17 of those motions are identical), the one-week extension will not result in any undue delay
18 or prejudice, as it will ensure that the timelines for both motions coincide with one another.

19 This Stipulation is made in good faith and not for the purpose of delay. As noted,
20 this is the first extension of time filed with regard to this reply brief. Given that the reply
21 brief deadline for the Motion for Summary Judgment is November 8, 2019, and Defendants
22 are not seeking to extend that deadline, no delay in the decision of this motion will occur
23 as a result of this one-week extension.

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1 Accordingly, the parties hereby stipulate to extend the deadline to file their reply
2 brief in support of Defendants' respective Motions to Dismiss one week, making the new
3 deadline **Friday, November 8, 2019** as opposed to Friday, November 1, 2019.

4 Respectfully stipulated to by the parties and submitted on this 31st day of October,
5 2019:

6 On behalf of Plaintiff:

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13 On behalf of
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22 **ORDER**

23 Pursuant to the stipulation of the parties stated herein, Defendants' Reply Briefs in
24 support of their respective Motions to Dismiss shall be due on **Friday, November 8, 2019**,
25 as opposed to Friday, November 1, 2019.

26 IT IS SO ORDERED.

27 Dated: November 1, 2019.

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U.S. DISTRICT COURT JUDGE