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

8 JACQUELYNN NICKLER,) Case No. 2:14-cv-01907-JCM-DJA
9)
10 Plaintiff,) **STIPULATION AND ORDER TO**
11 vs.) **EXTEND TIME FOR PLAINTIFF**
12) **TO REPLY TO DEFENDANTS'**
13) **OPPOSITIONS TO MOTION**
14) **FOR LEAVE TO FILE**
15) **AMENDED COMPLAINT**
16) **(FIRST REQUEST)**
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Defendants.)

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19 The parties, by and through their respective counsel, hereby stipulate to extend the
20 time for Plaintiff to reply to the Defendants' oppositions (ECF Nos. 108 and 109) to
21 Plaintiff's motion seeking leave to file a First Amended Complaint. (ECF No. 103) Also
22 Defendants Clark County and Lambermont filed a separate Joinder to Defendant
23 Grierson's Opposition (ECF No. 112). The proposed extension is from the current due
24 date of Thursday, November 14, 2019 through and including **Thursday, November 21,**
25 **2019.**

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27 This is the first request for an extension of this deadline. The parties provide the
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following information to the Court regarding the proposed extension of time:

1. Plaintiff’s counsel has informed Defense counsel that an extension to file the reply is needed because due to the Veterans Day holiday weekend, with a number of longstanding family plans and responsibilities there has been insufficient time for Plaintiff’s counsel to respond to the 19 page and 12 page Oppositions and the five page Joinder;
2. Plaintiff’s counsel has family in from Florida and Washington for a long planned family get together surrounding Plaintiff’s son playing in his Las Vegas Academy band concert at the Smith Center on Wednesday night, November 13, 2019. These family members arrived on Saturday and Tuesday respectively and the last of them do not leave until this coming Saturday.
3. Additionally, Plaintiff’s counsel has had a very heavy workload in this period. On November 12 he had a morning hearing in state court and an afternoon deposition in another cases against Clark County at the office of Mr. Freeman (opposing counsel in this matter for Clark County and Lambermont). Then on Wednesday, November 13 Plaintiff’s counsel had a lengthy settlement conference with Magistrate Judge Albregts followed by an administrative Workers’ Compensation appeal hearing and then several client meetings. Thursday, November 14 must be devoted to opposing a Summary Judgment Motion, the opposition being due on Monday, November 18, 2019.

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This stipulation to extend the deadline is made in good faith and not for purposes of delay.

Dated: November 14, 2019


Dated: November 14, 2019

/s/ James P. Kemp
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IT IS SO ORDERED:



MAGISTRATE JUDGE

Dated: November 18, 2019