

1 CAL J. POTTER, III, ESQ.
Nevada Bar No. 1988
2 C. J. POTTER, IV, ESQ.
Nevada Bar No. 13225
3 POTTER LAW OFFICES
1125 Shadow Lane
4 Las Vegas, Nevada 89102
Tel: (702) 385-1954
5 Fax: (702) 385-9081
Attorneys for Plaintiffs
6

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

9 JACQUELYNN NICKLER

10 Plaintiffs,

CASE NO.: 14-cv-1907-APG-CWH

11 vs.

12 COUNTY OF CLARK, organized and of the
13 existing under the laws of State of Nevada;
STEVEN D. GRIERSON, court administrator,
14 individually; KATHLEEN LAMBERMONT,
administrator of the Clark County District
15 Attorney's office, individually; and,
DOE 1 through 10, inclusive;

16 Defendants.
17 _____ /

18 **STIPULATION AND ORDER TO EXTEND PLAINTIFF'S RESPONSE TO**
19 **DEFENDANT STEVEN GRIERSON'S MOTION TO DISMISS**

20 Pursuant to LR 6-1, Plaintiff, Jacquelynn Nickler, by and through her counsel of record
21 Cal J. Potter, III, Esq. and C. J. Potter, IV, Esq. of Potter Law Offices; Defendant, Steven D.
22 Grierson, by and through his counsel of record Frederick J. Perdomo, Deputy Attorney
23 General; and Defendants, Clark County and Kathleen Lambermont, by and through their
24 counsel of record, Robert. W. Freeman, Esq. and Cayla Witty, Esq. of Lewis Brisbois Bisgaard
25 & Smith, hereby stipulate and request that the scheduled date of filing of Plaintiff's Response
26 to Defendant Steven Grierson's Motion to Dismiss [doc. 12] and Joinder [doc. 18], currently
27 due on Friday, March 6, 2015, be extended twenty (20) days up to and including Thursday,
28 March 26, 2015.

1 Plaintiff submits that good cause exists for this extension as Plaintiff's counsel, in
2 addition to working on this response, has been preparing a post-conviction writ that cannot be
3 extended, had three (3) depositions and four (4) day-long mandatory settlement conferences, in
4 addition to other deadlines and appearances since the time Defendant filed his Motion.
5 Additionally, next week, Plaintiff's counsel has five (5) depositions and numerous criminal
6 appearances.

7 Based upon the foregoing, the parties request that this Court order the time for the
8 Plaintiff to file her response to the Motion to Dismiss [doc. 12] and Joinder [doc. 18] to
9 Thursday, March 26, 2015. The parties also request that this Court provide a concomitant
10 enlargement of time for the Defendant's Reply thereto.

11 ...

12 ...

13 ...

14 ...

15 ...

16 ...

17 ...

18 ...

19 ...

20 ...

21 ...

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

3 APPROVED AS TO FORM AND CONTENT.

4 DATED this 6th day of March, 2015.

DATED this 6th day of March, 2015.

5 POTTER LAW OFFICES

OFFICE OF THE NEVADA ATTORNEY
GENERAL

6 By: /s/ Cal J. Potter, III, Esq.

By /s/ Frederick J. Perdomo, Esq.

7 CAL J. POTTER, III, ESQ.

ADAM P. LAXALT, Attorney General

8 Nevada Bar No. 1988

FREDERICK J. PERDOMO, Deputy A.G.

9 C. J. POTTER, IV, ESQ.

Nevada Bar No. 10714

10 Nevada Bar No. 13225

100 North Carson Street

11 1125 Shadow Lane

Carson City, NV 89701

12 Las Vegas, Nevada 89102

Attorney for Defendant Steven D. Grierson

Attorneys for Plaintiff

11 DATED this 6th day of March, 2015.

12 LEWIS BRISBOIS BISGAARD &
13 SMITH, LLP

14 By /s/ Robert W. Freeman, Esq.

15 ROBERT W. FREEMAN, ESQ.

16 Nevada Bar No. 3062

17 CAYLA WITTY, ESQ.

18 Nevada Bar No. 12897

19 6385 South Rainbow Boulevard, Ste. 600

20 Las Vegas, NV 89118

21 *Attorney for Defendants Clark County*
22 *and Kathleen Lambermont*

23 **ORDER**

24 IT IS SO ORDERED.

25 Dated this 9th day of March, 2015.

26 
27 _____
28 U.S. DISTRICT COURT JUDGE