	1 2 3 4 5 6 7 8	ANDREW C. GREEN, ESQ. Nevada Bar No. 9399 DAVID M. GOULD. ESQ. Nevada Bar No. 11143 KOELLER NEBEKER CARLSON & HALUCK, LLP 300 S. Fourth St., Suite 500 Las Vegas, NV 89101 Phone: (702) 853-5500 Fax: (702) 853-5599 Attorneys for Defendant, SAFECO INSURANCE COMPANY OF AMERICA UNITED STATES DISTRICT COURT				
	9	DISTRICT OF NEVADA				
	10	EDWARD STOLZ, an individual,)	CASE NO.: 2:14-cv-02060-RFB-NJK		
	11	Plaintiff,)			
	12	VS.)	STIPULATION AND ORDER TO EXTEND TIME FOR PARTIES TO FILE		
	13	SAFECO INSURANCE COMPANY OF AMERICA, a New Hampshire corporation;)	REPLIES TO MOTIONS FOR SUMMARY JUDGMENT		
	14	DOES I through X, ROE CORPORATIONS)	[FIRST REQUEST]		
	15	XI through XX, Defendants)	[FIRST REQUEST]		
	16	6				
	17	COME NOW, Plaintiff, EDWARD STOLZ, by and through his attorney of				
	18	Matthew M. Pruitt, Esq., of the law firm of ALVERSON, TAYLOR, MORTENSE				
	19 SANDERS and Defendant, SAFECO INSURANCE COMPANY OF A			NCE COMPANY OF AMERICA [hereinafter		
	20	"Safeco], by and through its counsel of record, the law firm of KOELLER, NEBEKER,				
	21 CARLSON & HALUCK, LLP, and hereby stipulate to extend the time for each					
	Replies to one another's respective Motions for Summary Judgment filed in the			Summary Judgment filed in the above-entitled		
23		matter.				
	24	Each party filed their own Motion for Summary Judgment on January 8, 2016.				
	25 26	Oppositions to the respective Motions were fi	d by the parties on February 16, 2016. (See,			
	27	Court Documents Nos. 42, 43, 46 and 47, on-file herein). In an effort for potential informal				
	28	settlement negotiations and mediation and/or a settlement conference, the parties have agreed				
1	20	to seek an extension of time to file their Replies, as indicated herein.				
	11					

1	The parties' Replies are currently due by or before March 4, 2016. As such, the parties		
2	hereby request an Order from this Court memorializing that Replies to each party's Motion for		
3	Summary Judgment are now due by or before <u>Tuesday, May 3, 2016</u> .		
4			
5	DATED this 25 th day of February, 2016.	DATED this 25 th day of February, 2016.	
6	ALVERSON, TAYLOR, MORTENSEN & SANDERS	KOELLER, NEBEKER, CARLSON & HALUCK, LLP	
7	C SIN IS ENG	a mileon, Elli	
8	By/s/Matthew M. Priutt	By/s/ David M. Gould	
9	MATTHEW M. PRUITT, ESQ. Nevada Bar No. 12474	DAVID M. GOULD, ESQ. Nevada Bar No. 11143	
10	7401 W. Charleston Boulevard	300 South Fourth Street, Suite 500	
11	Las Vegas, Nevada 89117 Attorneys for Plaintiff,	Las Vegas, NV 89101 Attorneys Defendant,	
12	EDWARD STOLZ	SAFECO INSURANCE COMPANY OF AMERICA	
13			
14	<u>ORDER</u>		
15	IT IS HEREBY ORDERED that the time for each party to file its Reply in support of		
16	the presently pending Motions for Summary Judgment (Court Documents Nos. 42, 43, 46 and		
17	47, on-file herein) is extended until <u>Tuesday, May 3, 2016</u> . The parties will also submit a joint		
18	status report to this Court regarding any pending motions by May 9, 2016.		
19			
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21		45	
22	Respectfully submitted by,	RICHARD F. BOULWARE, II	
23	KOELLER, NEBEKER, CARLSON	United States District Judge	
24	& HALUCK, LLP	DATED this 1st day of March, 2016.	
25			
26	By/s/ <u>David M. Gould</u> DAVID M. GOULD, ESQ.		
27	Nevada Bar No. 11143		
28	300 South Fourth Street, Suite 500		
	Las Vegas, NV 89101 Attorneys Defendant, SAFECO INSURANCE COMPANY OF AMERICA		