702) 562-4144

14

15

16

17

18

19

20

21

22

23

24

25

ROBERT J. FLUMMERFELT, ESQ. 1 Nevada Bar No. 11122 2 CANON LAW SERVICES, LLC CanonLawServices@Gmail.com 3 7251 W. Lake Mead Blvd., Suite 300 Las Vegas, Nevada 89128 4 Telephone: (702) 562-4144 Facsimile (702) 866-9868 5 Attorney for Plaintiff Nathan Okpoti 6 UNITED STATES DISTRICT COURT 7 8 NATHAN OKPOTI, an individual, 9 Plaintiff, 10 VS. 11 LAS VEGAS METROPOLITAN POLICE 12 13

CASE NO.: 2:15-cv-00110-APG-CWH

STIPULATION AND ORDER TO EXTEND FILING DEADLINE FOR PLAINTIFF'S OPPOSITIONS TO **DEFENDANTS' DISPOSITIVE MOTIONS**

(First Request)

DISTRICT OF NEVADA

DEPARTMENT, a Political Subdivision of the STATE OF NEVADA; CITY OF LAS VEGAS, a public entity; OFFICER JOHN D. BRANDON, in his individual and official capacities; POLICE OFFICER DOES I-XX and JOHN DOES I-XX, inclusive,

Defendants.

Pursuant to Local Rules 6-1, 6-2, and 7-1, the above-referenced parties, by and through their respective counsel of record, hereby agree and stipulate to extend the deadline for the filing of Plaintiff's oppositions to Defendants' Motions for Summary Judgment, to wit: Defendant City of Las Vegas' Motion for Summary Judgment [ECF No. 80], Officer Brandon's Motion for Summary Judgment [ECF No. 81], and Las Vegas Metropolitan Police Department's Motion for Summary Judgment [ECF No. 82]. The current deadline for the filing of Plaintiff's oppositions to each of the three pending motions for summary judgment is Monday, August 1, 2016. Due to the number of oppositions due simultaneously and the volume of documents contained within the motions, Defendants have graciously permitted Plaintiff an

CANON LAW SERVICES, LLC

410 S. Rampart Blvd., Suite 390 Las Vegas, Nevada 89145 (702) 562-4144

additional two (2) weeks to file his oppositions to all pending motions for summary judgment. As such, based on the agreement of the parties, Plaintiff's oppositions shall now be due no later than Monday, August 15, 2016.

This extension request is not being sought to unduly delay the proceedings; rather, good cause exists for this extension as Plaintiff requires the additional time to adequately prepare his oppositions to the lengthy dispositive motions. This extension will not prejudice any party and will, in fact, allow the parties to properly brief their positions in defense and/or in support of the motions for this Honorable Court. Moreover, the parties are not delaying the conclusion of this

24

25

1		del dete has not have and and
1	matter by way of trial or otherwise, as no tr	rai date has yet been ordered.
2	DATED this <u>28th</u> day of July, 2016.	DATED this <u>28th</u> day of July, 2016.
3	/s/ ROBERT J. FLUMMERFELT, ESQ.	/s/ ELIAS P. GEORGE, ESQ.
4	ROBERT J. FLUMMERFELT, ESQ. Nevada Bar No. 11122	BRADFORD R. JERBIC, ESQ. Nevada Bar No. 1056
5		ELIAS P. GEORGE, ESQ.
6	CANON LAW SERVICES, LLC CanonLawServices@Gmail.com	Nevada Bar No. 12379 Deputy City Attorney
7	7251 W. Lake Mead Blvd., Suite 300 Las Vegas, Nevada 89128	egeorge@lasvegasnevada.gov 495 S. Main Street, Sixth Floor
8	Telephone: (702) 562-4144 Facsimile (702) 866-9868	Las Vegas, NV 89101 Telephone: (702)634-5000
9	Attorneys for Plaintiff Nathan Okpoti	Facsimile: (702) 386-1749
10	DATED this <u>28th</u> day of July, 2016.	BRENT VOGEL, ESQ. Nevada Bar No. 6858
11	/s/ LYSSA S. ANDERSON, ESQ.	LEWIS BRISBOIS BISGAARD & SMITH, LLP
12	LYSSA S. ANDERSON, ESQ. Nevada Bar No. 5781	brent.vogel@lewisbrisbois.com 6382 S. Rainbow Boulevard, Suite 600
13	RYAN W. DANIELS, ESQ. Nevada Bar No. 13094	Las Vegas, Nevada 89118 Telephone: (702) 893-3383
14	KAEMPFER CROWELL	Facsimile: (702) 893-3798
15	1980 Festival Plaza Drive, #650 Las Vegas, Nevada 89135	Attorneys for Defendant City of Las Vegas
	Telephone: (702) 792-7000 Facsimile: (702) 796-7181	
16	Attorneys for Defendants LVMPD and Ofc. John Brandon	
17	IT IS SO ORDERED:	
18	Dated: July 28, 2016.	
19	Batea. July 20, 2010.	
20		Got and the second
21		UNITED STATES DISTRICT COURT JUDGE
22		
23		