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17 **UNITED STATES DISTRICT COURT**
18 **DISTRICT OF NEVADA**

19 BRADLEY ROBERTS, individually,
20
21 Plaintiff,
22 vs.
23 CLARK COUNTY SCHOOL DISTRICT;
DOES I-X; and ROE CORPORATIONS I-X,
24 inclusive,
25 Defendants.

Case No.: 2:15-CV-00388-JAD-PAL
**STIPULATION AND ORDER TO EXTEND
TIME FOR PLAINTIFF TO COMPLY
WITH 1-11-16 COURT ORDER (DKT. #99)**
(First Request)

26 Plaintiff Bradley Roberts and Defendant Clark County School District, by and through their
27 undersigned counsel, hereby agree and stipulate to extend today's deadline for Plaintiff Bradley
28 Roberts to fully comply with all aspects of Court Order #99, including producing supplemental

1 discovery disclosures regarding: 1) content from his social media accounts; and 2) supplementation
2 of his response to CCSD's Request for Production No. 23. The parties, through counsel, agree to ask
3 the Court for an extension of eight (8) days, up to and including February 2, 2016, and ask that the
4 Court approve the same for the good cause reasons set forth below.

5 Defendant's Motion to Compel [Dkt. #57] and Motion for a Qualified Protective Order [Dkt.
6 #60] were heard by the Court on December 8, 2015. Thereafter, the Court filed its Order [Dkt. #99]
7 granting in part and denying in part Defendant's Motion to Compel and denying Defendant's
8 Plaintiff's Motion for a Qualified Protective Order [Dkt. #99].

9 Pursuant to the Court's Order, the Court has required counsel for Plaintiff to identify all of
10 the social media websites on which Plaintiff has had an account from 2011 to the present. The
11 Court has also required that counsel for Roberts review the content of those social media accounts
12 from January 2011, to the present, and produce any content that contains a reference to this lawsuit,
13 Defendant's response to Plaintiff's transgender transition, Plaintiff's state of mind, emotional or
14 physical response or reaction to his transgender transition, and the manner in which he was treated
15 by CCSD employees, managers, supervisors, and counsel. Plaintiff's supplemental response must
16 be signed with the certification required by Rule 26(g)(1)(A). [Dkt. #99].

17 Additionally, pursuant to the Court's Order, Plaintiff is required to identify, disclose, and/or
18 produce all documents that describe, relate, or evidence his garden-variety emotional distress by
19 supplementing his prior response to CCSD's Request for Production No. 23. [Dkt. #99].

20 The supplemental discovery responses described above were ordered to be produced no later
21 than January 25, 2016. [Dkt. #99]. Plaintiff and Plaintiff's counsel have been diligently working on
22 complying with the Court's Order since receiving that Court Order on January 11, 2016. To do so,
23 Plaintiff and Counsel have had to re-review a monumental number of social media posts so that
24 proper disclosures can be made. Plaintiff needs an extension of time to do so and produce
25 responsive documents (posts) and to supplement his prior response to RTP No. 23.

26 This extension was requested by Plaintiff's counsel to allow Plaintiff and Plaintiff's counsel
27 to completely comply with the Court's January 11, 2016 Order and to ensure that the supplemental
28 response for Plaintiff's social media postings can be properly signed by Plaintiff's counsel with the


1 certification required by Rule 26(g)(1)(A). Plaintiff's counsel has accorded Defendant CCSD
2 counsel reciprocal courtesy for similar extensions. The parties agree and represent to the Court that
3 this constitutes good cause and that this request is made in good faith and not for the purpose of
4 prejudicial delay.

5 DATED January 25, 2016

DATED

6 MAIER GUTIERREZ AYON

LITTLER MENDELSON, P.C.

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17 **ORDER**

18 IT IS SO ORDERED this 27 day of January, 2016

19 
20 **U.S. MAGISTRATE JUDGE PEGGY LEEN**

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