

1 THEODORE PARKER, III, ESQ.  
 Nevada Bar No. 4716  
 2 **PARKER, NELSON & ASSOCIATES, CHTD.**  
 2460 Professional Court, Suite 200  
 3 Las Vegas, Nevada 89128  
 4 Telephone: (702) 868-8000  
 Facsimile: (702) 868-8001  
 5 Email: [Tparker@pnalaw.net](mailto:Tparker@pnalaw.net)

6 F. TRAVIS BUCHANAN, ESQ.  
 Nevada Bar No. 9371  
 7 **F. TRAVIS BUCHANAN, ESQ. & ASSOCIATES, PLLC**  
 701 E. Bridger Avenue, Suite 540  
 8 Las Vegas, Nevada 89101  
 9 Telephone: (702) 331-5478  
 Facsimile: (702) 629-6919  
 10 Email: [Ftblaw@gmail.com](mailto:Ftblaw@gmail.com)

11 *Attorneys for Plaintiffs*

12 **UNITED STATES DISTRICT COURT**  
 13 **DISTRICT OF NEVADA**

14 \* \* \*

15 PARENT DOE, individually, and JOHN  
 16 DOE, individually,

17 Plaintiffs,

18 vs.

19 CLARK COUNTY SCHOOL DISTRICT;  
 20 ERIN WING; JEANNE DONADIO  
 Principal, in her Official and Individual  
 21 Capacities; JOHN DOES I-X, inclusive;  
 and  
 22 ROE CORPORATIONS I-X, inclusive,

23 Defendants.

Case No. 2:15-cv-00793-APG-GWF

**STIPULATION AND ORDER TO  
 EXTEND TIME TO FILE JOINT PRE-  
 TRIAL ORDER**

**(SECOND REQUEST)**

24 COME NOW the parties, by and through their counsel of record, and hereby submit the  
 25 instant Stipulation and Order to Extend Time to file Joint Pre-Trial Order. The parties request the  
 26 current deadline of March 12, 2018, be extended 21-days up to April 2, 2018.

27 On January 11, 2018, this Court issued its Order Granting in part and Denying in part  
 28 Defendant's Motion for Summary Judgment. In light of various causes of action being dismissed

1 from the action, 6 months after the original July 6, 2017 due date for the Joint Pre-Trial Order, the  
2 requested extension will allow the parties time to streamline their witness and exhibit lists, and  
3 continue their discussions re: the applicability of various state tort damage caps to the remaining  
4 causes of action. While the parties are continuing to work to prepare and submit the Joint Pre-Trial  
5 Order, the parties' ongoing discussions concerning the applicability of various state tort damage  
6 caps to Plaintiffs' surviving claims, might assist the parties with case evaluation and settlement  
7 negotiations. The parties are requesting that this Court extend the time to file the Joint Pre-Trial  
8 Order while the parties attempt to resolve their positions on the applicable damage caps and  
9 counsel to finalize drafting a proposed Order for the claims allowed to proceed by the Court.  
10 Specifically, the parties request a three-week extension of the time to file the Joint Pre-Trial Order,  
11 extending the deadline until April 2, 2018.

12 This request is made in good faith and not as an attempt to needlessly delay these  
13 proceedings.

14 DATED this 5<sup>th</sup> day of March, 2018.

15 **PARKER, NELSON & ASSOCIATES,**  
16 **CHTD.**

17 /s/ Theodore Parker III  
18 THEODORE PARKER, III, ESQ.  
19 Nevada Bar No. 4716  
20 2460 Professional Court, Suite 200  
21 Las Vegas, Nevada 89128

22 F. TRAVIS BUCHANAN, ESQ.  
23 Nevada Bar No. 9371  
24 **F. TRAVIS BUCHANAN, ESQ. &**  
25 **ASSOCIATES, PLLC**  
26 701 E. Bridger Avenue, Suite 540  
27 Las Vegas, Nevada 89101  
28 *Attorneys for Plaintiffs*

**CLARK COUNTY SCHOOL DISTRICT**

/s/ S. Scott Greenberg  
S. SCOTT GREENBERG, ESQ.  
Nevada Bar No. 4622  
5100 W. Sahara Avenue  
Las Vegas, Nevada 89146  
*Attorneys for Defendants*

**IT IS SO ORDERED:**

  
UNITED STATES MAGISTRATE JUDGE

Dated: March 6, 2018