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9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 LENARD E. SCHWARTZER, in his capacity as
the Bankruptcy Trustee for the Bankruptcy Estate
12 of Alisson Santos,
13
14 Plaintiff,
15 vs.
16 AMERICAN FAMILY MUTUAL INSURANCE
COMPANY, a corporation; and DOES I through
17 V; and, ROE CORPORATIONS VI through X,
inclusive,
18 Defendants.

CASE NO.: 2:15-cv-01115-APG-PAL

**JOINT STIPULATION AND ORDER TO
EXTEND TIME TO SUBMIT JOINT
PRETRIAL ORDER
(First Request)**

19 IT IS HEREBY STIPULATED AND AGREED, by Plaintiff, LENARD E.
20 SCHWARTZER and Defendant AMERICAN FAMILY MUTUAL INSURANCE COMPANY, by
21 and through their undersigned counsel, that the following extension be made to the pretrial order
22 schedule in this matter. If granted, this will be the first extension to the pretrial order schedule.

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24 Counsel for Plaintiff and Defendant have been unable to meet to review the proposed
25 exhibits before submitting a pretrial order, as requested by the Honorable Judge Gordon, and now
26 request an extension of time to do so. Counsel for both Parties have exchanged exhibits and page-
27 line designations for proposed depositions, and are in the process of finalizing stipulations to
28 exhibits. Counsel have been unable to conduct the meet and confer as required as Counsel for

1 Plaintiff has been conducting depositions and mediations all week, and counsel for Defendant has
2 been ill, creating a situation where neither party has been able to meet with the other. Additionally,
3 counsel for Plaintiff will be out of town from January 26, 2017, until January 30, 2017, on pre-
4 existing business, creating an insurmountable obstacle to convening a physical meeting of both
5 counsel before the deadline on January 27, 2017. Counsel for both parties now stipulate and agree
6 to the following:
7

- 8 1. Counsel for Plaintiff and Defendant shall have up to and including February 3,
9 2017, to conduct a meaningful meet and confer and submit a joint pretrial order that
10 complies with Local Rules 16-3 and 16-4 and this Court's December 28, 2016
11 Order.

12 /s/ MARK L. JACKSON

12 /s/ TROY A. CLARK

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22 Las Vegas, Nevada 89144
23 *Counsel for Defendant*

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2 ORDER

3 IT IS HEREBY ORDERED, ADJUDGED, AND DECREED:

- 4 1. Counsel for Plaintiff and Defendant shall have up to and including February 3, 2017, to
5 conduct a meaningful meet and confer and submit a joint pretrial order that complies
6 with Local Rules 16-3 and 16-4 and this Court's December 28, 2016 Order.

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9 IT IS SO ORDERED this 9th day of March, 2017.

10
11 By: 
12 U.S. DISTRICT COURT JUDGE

13 Respectfully submitted: January 25, 2017

14 /s/ MARK L. JACKSON

/s/ TROY A. CLARK

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