

1 CLARK COUNTY SCHOOL DISTRICT  
 OFFICE OF THE GENERAL COUNSEL  
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6  
 7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 JILL LEFF, et. al,

10 Plaintiffs,

11 v.

12 CLARK COUNTY SCHOOL DISTRICT, a  
 county school district,

13 Defendant.

CASE NO.:

2:15-CV-01155-RFB-GWF

**STIPULATION TO EXTEND TIME FOR  
 REMAINING BRIEFING ON PARTIES'  
 MOTIONS FOR SUMMARY JUDGMENT**

(First Request)

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 15 COME NOW, the parties, by and through their attorneys of  
 16 record, and hereby stipulate and agree to extend the time for the  
 17 remaining briefing with respect to the motions for summary judgment.  
 18 Plaintiffs' summary judgment motion (Docket No. 34) was filed May  
 19 25, 2017. Both Plaintiffs and Defendant filed motions for summary  
 20 judgment on May 25<sup>th</sup> and their respective responses are due June  
 21 15<sup>th</sup>. The parties request fourteen (14) day extensions for filing  
 22 responses and reply briefs. Responses would be due June 29, 2017,  
 23 and the reply briefs (normally due fourteen (140 days later) would  
 24 be due July 27, 2017. This is the first request to extend the time  
 25 for filing the remaining summary judgment briefs and is not made for  
 26 any reason of delay but because of counsels' recent work commitments  
 27 and July schedules.

28 Since the filing of the motions for summary judgment, defense  
 counsel has motions for summary judgment due in two other federal

1 cases (plus responses due in one of those matters to the plaintiff's  
2 recent requests to reopen discovery and amend complaint) prior to  
3 June 15<sup>th</sup>, a response due to an OSHA employee retaliation complaint,  
4 an employee dismissal arbitration on June 6<sup>th</sup>, and will be in  
5 depositions for several days in another federal case to conclude  
6 depositions by the June 15<sup>th</sup> discovery deadline in that matter.  
7 Additionally defense counsel's office is moving June 9<sup>th</sup> so his  
8 office must be packed by the end of June 8<sup>th</sup> and the move, including  
9 computers, is to take place on June 9<sup>th</sup> and through the weekend,  
10 therefore it is expected this will take up defense counsel's time  
11 immediately before June 8<sup>th</sup> and into the next week. Plaintiffs'  
12 counsel has been involved in two (2) arbitrations since the filing  
13 of the motions for summary judgment and recently had the briefing  
14 schedule restarted without prior notice in a complex appellate  
15 matter that had been stayed which is expected to take significant  
16 time. Given counsels' other work commitments, it is respectfully  
17 requested that the remaining briefing schedule be extended as  
18 indicated below to allow sufficient time for counsel to prepare and  
19 complete briefs on behalf of the respective clients in this matter.

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1           Therefore, for the foregoing reasons, it is respectfully  
2 requested that the time for the response to Plaintiffs' summary  
3 judgment motion be extended to June 29, 2017, and that Plaintiffs'  
4 reply brief be due July 27, 2017.

5           DATED this 6<sup>th</sup> day of June, 2017.

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7           CLARK COUNTY SCHOOL DISTRICT  
8           Office of the General Counsel

          DYER, LAWRENCE, FLAHERTY,  
          DONALDSON AND PRUNTY  
          Attorneys at Law

9 By:       /s/ S. Scott Greenberg        
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          Attorneys for Plaintiff

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15       **IT IS SO ORDERED:**

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17       Date: June 8, 2017.

  
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          RICHARD F. BOULWARE, II  
          United States District Judge