

1 CLARK COUNTY SCHOOL DISTRICT
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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 Defendant's summary judgment motion (Docket No. 35) was filed May
19 25, 2017. Both Plaintiffs and Defendant filed motions for summary
20 judgment on May 25th and their respective responses are due June
21 15th. 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 (14) 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 15th, a response due to an OSHA employee retaliation complaint,
4 an employee dismissal arbitration on June 6th, and will be in
5 depositions for several days in another federal case to conclude
6 depositions by the June 15th discovery deadline in that matter.
7 Additionally defense counsel's office is moving June 9th so his
8 office must be packed by the end of June 8th and the move, including
9 computers, is to take place on June 9th and through the weekend,
10 therefore it is expected this will take up defense counsel's time
11 immediately before June 8th 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 the District's summary
3 judgment motion be extended to June 29, 2017, and that the
4 District's reply brief be due July 27, 2017.

5 DATED this 6th day of June, 2017.

6 CLARK COUNTY SCHOOL DISTRICT
7 Office of the General Counsel

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

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s

15 **IT IS SO ORDERED:**

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17 Date: June 8, 2017.

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20 RICHARD F. BOULWARE, II
21 United States District Judge
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