

1 CLARK COUNTY SCHOOL DISTRICT
OFFICE OF THE GENERAL COUNSEL
2 CARLOS L. MCDADE, ESQ.
Nevada Bar No. 11205
3 JON M. OKAZAKI, ESQ.
Nevada Bar No. 4710
4 5100 West Sahara Avenue
Las Vegas, Nevada 89146
5 Telephone: (702) 799-5373
Attorneys for Defendant, CCSD

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

10 JILL LEFF, CLAUDIA KRAUSE, KRISTA
SHIELDS, CHRISTOPHER STEWART,
11 NEKISHA SIMPSON, CARRIE CHAPPELL,
CAROLYN DOYEL, KODZO ATTILA,
12 JOSEPH PORTILLA, AMANDA LA FORTE,
PATRICIA WEBB, MARY RICE, BARBARA
13 GAMAGE, FRANCIS SIMONE BOJAR,
GLEN ROWLEY, and CLARK COUNTY
14 EDUCATION ASSOCIATION, an employee
organization,

15
16 Plaintiffs,

17 v.

18 CLARK COUNTY SCHOOL DISTRICT, a
county school district

19 Defendant.

CASE NO.: 2:15-CV-01155-RFB-GWF

STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
PLAINTIFFS' COMPLAINT

(First Request)

20
21 COME NOW, Plaintiffs and Defendant Clark County School
22 District ("District"), by and through their attorneys of record,
23 and hereby stipulate and agree that the District may have up to and
24 including September 4, 2015, to respond to the complaint in this
25 matter. The current response date is August 18, 2015. This is the
26 first request for an extension to the response due date.

27 This matter primarily concerns the constitutionality of
28 certain amendments to NRS Chapter 391 enacted by the Nevada

1 legislature in 2011. Plaintiffs have served Nevada's Attorney
2 General with notice pursuant to Fed.R.Civ.P 5.1 that this matter
3 concerns a constitutional challenge. This request is being entered
4 in good faith, and not for reason of delay, in order to allow the
5 parties to determine the State of Nevada's intention with respect
6 to defending the challenged statutes.

7 THEREFORE, the parties respectfully request that the District
8 may have up to and including September 4, 2015, to respond to the
9 complaint in this matter.

10 DATED this 29th day of July, 2015.

11 CLARK COUNTY SCHOOL DISTRICT
12 Office of the General Counsel


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

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14 By: /s/ Jon Okazaki
15 JON M. OKAZAKI
16 Nevada Bar No. 4710
17 5100 W. Sahara Ave.
18 Las Vegas, Nevada 89146
19 Attorneys for Defendants

By: /s/ Thomas J. Donaldson
Thomas J. Donaldson
Nevada Bar No. 5283
2805 Mountain Street
Carson City, NV 89703
Attorneys for Plaintiffs

20 **IT IS SO ORDERED:**

21 Date: July 30, 2015



GEORGE FOLEY, JR.
United States Magistrate Judge