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11 *Attorneys for Defendants*

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 **DARREN HEYMAN,**
 15
 16 **Plaintiff,**

17 Case No. 2:15-cv-01228-RFB-GWF

18 vs.

19 **THE STATE OF NEVADA EX**
 20 **REL.BOARD OF REGENTS OF THE**
 21 **NEVADA SYSTEM OF HIGHER**
 22 **EDUCATION ON BEHALF OF THE**
 23 **UNIVERSITY OF NEVADA, LAS VEGAS;**
 24 **NEAL SMATRESK; DONALD SNYDER;**
 25 **STOWE SHOEMAKER; RHONDA**
 26 **MONTGOMERY; CURTIS LOVE; SARAH**
 27 **TANFORD; PHILLIP BURNS; KRISTIN**
 28 **MALEK; LISA MOLL-CAIN; DEBRA**
PIERUSCHKA; ELSA SIDHU AND DOES
I – X INCLUSIVE,

STIPULATION AND ORDER TO
EXTEND DEADLINE FOR
DEFENDANTS TO FILE RESPONSIVE
PLEADINGS TO PLAINTIFF’S FIRST
AMENDED COMPLAINT

Defendants.

21 Defendants The State Of Nevada Ex Rel.Board Of Regents Of The Nevada System Of
 22 Higher Education On Behalf Of The University Of Nevada, Las Vegas (“UNLV”), Neal
 23 Smatresk, Donald Snyder, Stowe Shoemaker, Rhonda Montgomery, Curtis Love, Sarah Tanford,
 24 Phillip Burns, Kristin Malek, Lisa Moll-Cain, Debra Pieruschka, and Elsa Sidhu (“Defendants”),
 25 by and through counsel of record, Jackson Lewis P.C., and Plaintiff Darren Heyman (“Plaintiff”),
 26 hereby stipulate and agree to extend the time for Defendants to file responsive pleadings to
 27 Plaintiff’s First Amended Complaint for sixteen (16) days, from April 27, 2016, up to and
 28 including May 13, 2016.

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The parties collectively request this extension for the following reasons:

- Plaintiff Darren Heyman (“Plaintiff”) filed his First Amended Complaint (“Complaint”), Document No. 28, on April 13, 2016.
- Plaintiff’s Complaint spans 119 pages, and includes 31 claims and 12 named defendants. The prior draft complaint attached to Plaintiff’s Motion for Leave to Amend (Dkt. 20) spanned 78 pages, and included 16 claims and 10 named defendants. Thus, Plaintiff’s Complaint contains approximately 41 pages of additional allegations and claims against Defendants that will require time to evaluate in order to prepare responsive pleadings.
- Plaintiff’s Complaint added new claims against Defendant UNLV, UNLV’s General Counsel, Elda Sidhu, in her official capacity, and Assistant General Counsel, Debra Pieruschka, in both her official and individual capacity; and additional claims against Defendants Neal Smatresk, Donald Snyder, Stowe Shoemaker, Rhonda Montgomery, Curtis Love, Sarah Tanford, Phillip Burns, Kristin Malek, and Lisa Moll-Cain.
- Prior to Plaintiff’s filing of the Complaint, newly named Defendants Sidhu and Pieruschka were representing all of the Defendants in the case. As Defendants Sidhu and Pieruschka have been named in the Complaint, Sidhu and Pieruschka can no longer continue representing the Defendants in this case.
- Accordingly, Defendant UNLV just recently retained Jackson Lewis P.C., on April 22, 2016, to represent and defend UNLV and the other Defendants named in Plaintiff’s Complaint in this case.
- Jackson Lewis P.C. will file concurrently with this Stipulation a Substitution of Counsel for UNLV. Additionally, Jackson Lewis P.C. will subsequently file Substitutions of Counsel for the other named Defendants.
- Jackson Lewis P.C. will accept service of the Complaint on behalf of Defendants Debra Pieruschka and Elda Sidhu.
- Jackson Lewis P.C. also will file responsive pleadings for Defendants Debra Pieruschka and Elda Sidhu on or before May 13, 2016.

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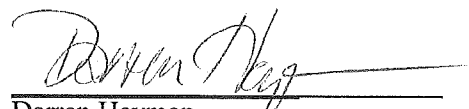
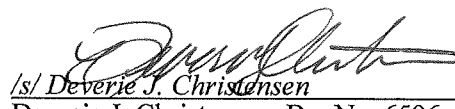
- The Parties will hold their Federal Rule of Civil Procedure 26(f) Conference within one week after the responsive pleadings have been filed on behalf of all Defendants.
- This is the first request for an extension of time for Defendants to file responsive pleadings to Plaintiff's Complaint.

This stipulation and order is sought in good faith and not for the purpose of delay. No prior request for any extension of time has been made with respect to Plaintiff's Complaint.

Dated this 25 day of April, 2016.

DARREN HEYMAN

JACKSON LEWIS P.C.

Darren Heyman
830 Carnegie St. #1324
Henderson, Nevada 89052
Plaintiff In Proper Person

/s/ Deverie J. Christensen
Deverie J. Christensen, Bar No. 6596
3800 Howard Hughes Parkway, Suite 600
Las Vegas, Nevada 89169
Attorneys for Defendants

ORDER

IT IS SO ORDERED DATED: April 26, 2016.



RICHARD F. BOULWARE II
United States District Judge

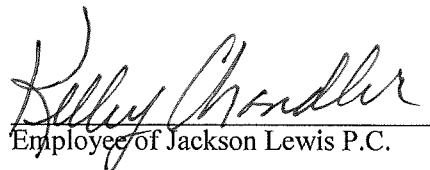
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CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Jackson Lewis P.C. and that on this 26th day of April, 2016, I caused to be served a true and correct copy of the above and foregoing, via the United States Mail, postage prepared, properly addressed to the following:

Darren Heyman
830 Carnegie St. #1324
Henderson, NV 89052

Plaintiff in Proper Person


Employee of Jackson Lewis P.C.

4812-6958-4689, v. 1