

Brenske & Andreevski  
3800 Howard Hughes Parkway, Suite 500  
Las Vegas, Nevada 89169  
(702) 385-3300 · Fax (702) 385-3823

1 WILLIAM R. BRENSKE, ESQ.  
Nevada Bar No. 1806  
2 JENNIFER R. ANDREEVSKI, ESQ.  
Nevada Bar No. 9095  
3 RYAN D. KRAMETBAUER, ESQ.  
Nevada Bar No. 12800  
4 BRENSKE & ANDREEVSKI  
5 3800 Howard Hughes Parkway, Suite 500  
Las Vegas, Nevada 89169  
6 Email [wbrenske@hotmail.com](mailto:wbrenske@hotmail.com)  
7 Telephone No.: (702) 385-3300  
Facsimile No.: (702) 385-3823  
8 *Attorney for Plaintiff,*  
*Kathryn Kingham*

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

12 KATHRYN KINGHAM,  
13  
14 Plaintiff,  
15 v.  
16 STATE FARM MUTUAL AUTOMOBILE  
INSURANCE COMPANY, duly authorized to  
17 conduct business in the State of Nevada;  
DOES 1 through 10, inclusive, and ROE  
CORPORATIONS 1 through 10, inclusive,  
18  
19 Defendants.

Case No.: 2:15-CV-01555-APG

**STIPULATION TO EXTEND TIME TO  
FILE A RESPONSE TO DEFENDANT'S  
MOTION FOR PARTIAL SUMMARY  
JUDGMENT**

(First Request)

20 IT IS HEREBY STIPULATED BY AND BETWEEN THE PARTIES, Plaintiff, Kathryn  
21 Kingham, by and through her attorneys of record, William R. Brenske and Jennifer R. Andreevski  
22 of Brenske & Andreevski, and Defendant, State Farm Mutual Automobile Insurance Company by  
23 and through its attorneys of record, Robert Freeman and Pamela L. McGaha of Lewis Brisbois  
24 Bisgard & Smith in accordance with Local Rule IA 6-1 of the Local Rules for the United States  
25 District Court for the District of Nevada and Rule 6(b)(1)(A) of the Federal Rules of Civil  
26 Procedure, to extend the deadline to answer or otherwise respond to Defendant, State Farm Mutual  
27 Automobile Insurance Company's Motion for Partial Summary Judgment (Doc. No. 31) by two  
28

1 weeks. Pursuant to this stipulation, responses to Defendant's motion shall be due on March 9, 2017.  
2 Responses are currently due on February 23, 2017.

3 Good cause exists for this extension as Defendant's dispositive motion is 55-pages long and  
4 includes over 2,700 pages of exhibits. There are also three claims Defendant is seeking to dismiss.  
5 In order to oppose or otherwise respond to the motion, it is necessary to review all the exhibits  
6 attached to Defendant's motion. Given the complexity of the motion and required response the  
7 parties and their counsel hereby stipulate to a two week extension to file a response.

8  
9 Extending the deadline to respond to State Farm's motion, up to and including March 9,  
10 2017, will ensure Plaintiff has a full and fair opportunity to respond to Defendant's Motion for  
11 Partial Summary Judgment (Doc. No. 31). A proposed order is provided below.

12 DATED: February 14, 2017

DATED: February 14, 2017

13  
14 /s/William R. Brenske, Esq.

/s/Pamela L. McGaha, Esq.

15 WILLIAM R. BRENSKE, ESQ.

ROBERT FREEMAN, ESQ.

16 Nevada Bar No. 1806

Nevada Bar No. 3062

JENNIFER R. ANDREEVSKI, ESQ.

PAMELA L. MCGAHA, ESQ.

17 Nevada Bar No. 9095

Nevada Bar No. 8181

BRENSKE & ANDREEVSKI

LEWIS BRISBOIS BISGAARD & SMITH

18 3800 Howard Hughes Parkway, Suite 500

6385 S. Rainbow Blvd., Suite 600

19 Las Vegas, NV 89169

Las Vegas, NV 89118

Telephone: (702) 385-3300

Telephone: (702) 893-3383

Facsimile: (702) 385-3823

Facsimile: (702) 893-3789

20 Email: [wbrenske@hotmail.com](mailto:wbrenske@hotmail.com)

Email: [Robert.Freeman@lewisbrisbois.com](mailto:Robert.Freeman@lewisbrisbois.com)

21 *Attorneys for Plaintiffs, Carolyn Mann*  
22 *individually and as Special Administrator of the*  
*Estate of David Anthony Mann and as Assignee of*  
*the Estate of Thomas Joseph Meyers*

*Attorneys for Defendant, State Farm Mutual*  
*Automobile Insurance Company*

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 KATHRYN KINGHAM,

Case No.: 2:15-CV-01555-APG

4 Plaintiff,

ORDER

5 v.

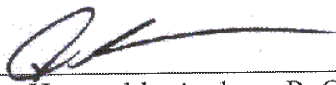
6 STATE FARM MUTUAL AUTOMOBILE  
7 INSURANCE COMPANY, duly authorized to  
8 conduct business in the State of Nevada;  
9 DOES 1 through 10, inclusive, and ROE  
10 CORPORATIONS 1 through 10, inclusive,

Defendants.

11 Pursuant to the parties' stipulation it is hereby:

12 ORDERED responses to State Farm's Motion for Partial Summary Judgment (Document  
13 No. 31) shall be due on or before March 9, 2017.

14 Dated: February 15, 2017.

15  
16  
17   
18 The Honorable Andrew P. Gordon  
19 United States District Judge  
20  
21  
22  
23  
24  
25  
26  
27  
28