

1 ROBERT W. FREEMAN  
 Nevada Bar No. 3062  
 2 [robert.freeman@lewisbrisbois.com](mailto:robert.freeman@lewisbrisbois.com)  
 E. MATTHEW FREEMAN  
 3 Nevada Bar No. 14198  
[matt.freeman@lewisbrisbois.com](mailto:matt.freeman@lewisbrisbois.com)  
 4 LEWIS BRISBOIS BISGAARD & SMITH LLP  
 6385 S. Rainbow Boulevard, Suite 600  
 5 Las Vegas, Nevada 89118  
 702.893.3383  
 6 FAX: 702.893.3789  
 Attorneys for Defendant  
 7 Corrections Officer Trainee  
 Raynaldo-John Ramos

8  
 9  
 10  
 11  
 12  
 13  
 14  
 15  
 16  
 17  
 18  
 19  
 20  
 21  
 22  
 23  
 24  
 25  
 26  
 27  
 28

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

\*\*\*

VICTOR PEREZ, as Special Administrator of  
 the Estate of CARLOS PEREZ, deceased;  
 VICTOR PEREZ, as the Guardian Ad Litem  
 for S.E.P, a minor; VICTOR PEREZ, as the  
 Guardian Ad Litem for A.I.P., a minor;

Plaintiff,

vs.

STATE OF NEVADA, ex. rel. NEVADA  
 DEPARTMENT OF CORRECTIONS;  
 DIRECTOR GREG COX, individually;  
 WARDEN DWIGHT NEVEN, individually;  
 ASSISTANT WARDER TIMOTHY FILSON,  
 individually; COT RAMOS, individually;  
 LIEUTENANT OLIVER, individually;  
 CORRECTIONS OFFICER CASTRO,  
 individually; CORRECTIONS OFFICER  
 SMITH, individually; and DOES I-X,  
 inclusive; and ROES I-X, inclusive;

Defendants.

CASE NO. 2:15-cv-1572-APG-DJA

**STIPULATION AND ORDER TO  
 EXTEND THE DEADLINE FOR THE  
 PARTIES TO FILE THEIR  
 DISPOSITIVE MOTIONS AND  
 ADOPTION OF BRIEFING SCHEDULE**

**FIRST REQUEST**

Pursuant to IA 6-1 and LR 26-3, Plaintiff, Victor Perez, as Special Administrator of the Estate of Carlos Perez, deceased; Victor Perez, as Guardian Ad Litem for S.E.P., a minor; Victor Perez, as Guardian Ad Litem for A.I.P., a minor, Defendants State of Nevada ex. rel. Nevada Department of Corrections, Director Greg Cox, Warden Dwight Neven, Assistant Warden Timothy Filson, COT Ramos, Lieutenant Oliver, Corrections Officer Castro, and Corrections

1 Officer Smith, by and through their respective counsel of record, hereby stipulate to extend the  
2 deadline to file Dispositive Motions in the above-captioned case by seven (7) days, up to and  
3 including October 25, 2021. The parties further stipulate that oppositions to Dispositive Motions  
4 will be due on November 22, 2021, and that Replies will be due on December 13, 2021.

5 This stipulation to extend time is not sought for any improper purpose or other purpose of  
6 delay. This request for extension is based upon the following:

7 Attorney for Defendant Corrections Officer Ramos is currently preparing motions that are  
8 due in *Latham v. Henderson*, case number A-19-790017-C; *Juma v. Clark County*, case number  
9 2:20-cv-00120-JCM-EJY; and *Perez, et al v. Ramos, et al*, case number 2:15-cv-1572-APG-DJA.

10 Further counsel for Defendant Corrections officer Trainee Raynaldo-John Ramos will be  
11 out of the state from October 7, 2021 to October 18, 2021.

12 The stipulated extension will not affect other deadlines of the scheduling order. Under LR  
13 26-1(b)(5), if dispositive motions are filed, the deadline for filing the pretrial order—currently set  
14 for November 18, 2021, ECF No. 142 at 6—will be suspended “until 30 days after decision on the  
15 dispositive motions or further court order.”

16 WHEREFORE, the parties respectfully request that this Court extend the time for the  
17 parties to file their Dispositive Motions by seven (7) days from the current deadline of October 18,  
18 2021 up to and including October 25, 2021, with Oppositions due on November 22, 2021 and  
19 Replies due on December 13, 2021.

20 DATED this 5<sup>th</sup> day of October, 2021.

DATED this 5<sup>th</sup> day of October, 2021.

21 LEWIS BRISBOIS BISGAARD & SMITH

CLARK HILL PLLC

22 /s/ Robert W. Freeman

/s/ Paola M. Armeni

23 ROBERT W. FREEMAN

PAOLA M. ARMENI

24 Nevada Bar No. 3062

Nevada Bar No. 8357

25 E. MATTHEW FREEMAN

JEREMY J. THOMPSON

26 Nevada Bar No. 14198

Nevada Bar No. 12503

27 6385 S. Rainbow Blvd, Suite 600

3800 Howard Hughes Parkway

28 Las Vegas, Nevada 89118

Suite 500

*Attorneys for the Defendants*

Las Vegas, Nevada 89169

*Las Vegas Metropolitan Police Department*

*Attorneys for Plaintiff*

*Officer Michael Souder*

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

DATED this 5<sup>th</sup> day of October, 2021.

AARON D. FORD

*/s / Akke Levin*

STEVEN G. SHEVORSKI

Nevada Bar No. 8256

AKKE LEVIN

Nevada Bar No. 9102

KIEL B. IRELAND

Nevada Bar No. 15368C

100 N. Carson Street

Carson City, Nevada 89701

*Attorneys for Defendants*

*State of Nevada, ex. rel. Nevada Department*

*of Corrections, Director James Greg Cox,*

*Warden, Dwight Neven, Assistant Warden*

*Timothy Filson, and Lieutenant Ronald*

*Oliver*

DATED this 5<sup>th</sup> day of October, 2021.

ARMSTRONG TEASDALE LLP

*/s / Jeffrey S. Barr*

JEFFREY F. BARR

Nevada Bar No. 7269

3770 Howard Hughes Parkway

Suite 200

Las Vegas, Nevada 89169

*Attorneys for Defendant*

*Corrections Officer Isaiah Smith*

DATED this 5<sup>th</sup> day of October, 2021.

MARQUIS AURBACH & COFFING

*/s / Craig R. Anderson*

CRAIG R. ANDERSON

Nevada Bar No. 06822

JAMES A. BECKSTROM

Nevada Bar No. 14032

10001 Park Run Drive

Las Vegas, Nevada 89145

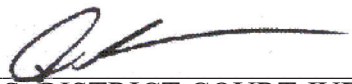
*Attorneys for Defendant*

*Corrections Officer Castro*

**ORDER**

IT IS SO ORDERED.

Dated this 6<sup>th</sup> day of October \_\_\_\_\_, 2021.



\_\_\_\_\_  
U.S. DISTRICT COURT JUDGE