

1 CLARK HILL PLLC
 2 PAOLA M. ARMENI
 Nevada Bar No. 8357
 Email: parmeni@clarkhill.com
 3 JEREMY J. THOMPSON
 Nevada Bar No. 12503
 4 Email: jthompson@clarkhill.com
 5 3800 Howard Hughes Pkwy., #500
 Las Vegas, Nevada 89169
 6 Tel: (702) 862-8300
 Fax: (702) 862-8400
 7 *Attorneys for Plaintiffs, Perez Family*

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

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

13 Plaintiffs,

14 vs.

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

21 Defendants.

CASE NO.: 2:15-cv-01572-APG-DJA

**STIPULATION AND ORDER TO
 EXTEND MOTION FOR
 SUMMARY JUDGMENT BRIEFING
 DEADLINES
 (First Request)**

22 Victor Perez, as Special Administrator of the Estate of Carlos Perez, deceased, by and
 23 through his counsel, Paola M. Armeni, Esq., and Jeremy J. Thompson, Esq., of the law firm of
 24 Clark Hill, Defendant Raynaldo Ramos, by and through his counsel, Robert W. Freeman, Jr. Esq.,
 25 of the law firm of Lewis Brisbois Bisgaard & Smith, LLP, Defendants, State of Nevada ex rel
 26 Nevada Department of Corrections, James Greg Cox, Timothy Filson, Dwight W. Neven and
 27 Ronald Oliver, by and through their counsel, Steve Shevorski, Esq. and Akke Levin, Esq., of the
 28

1 Attorney General’s Office, Defendant Isaiah Smith, by and through his counsel of record Jeffrey
2 F. Barr, Esq. of the law firm of Armstrong Teasdale, and Defendant Jeff Castro, by and through
3 his counsel, James A. Beckstrom, Esq., of the law firm of Marquis Aurbach Coffing, hereby
4 respectfully submit this Stipulation and Order Extending Time for: (1) Plaintiff to Respond to
5 Defendant Corrections Officer Castro’s Motion for Summary Judgment [Dkt 146], Defendant
6 Raynaldo-John Ramos’ Motion for Summary Judgment [Dkt 147], State of Nevada Ex Rel.
7 Nevada Department of Corrections, James “Greg” Cox, Timothy Filson, Dwight Neven and
8 Ronald Oliver’s Motion for Summary Judgment [Dkt 153], and Defendant Isaiah Smith’s Motion
9 for Summary Judgment [Dkt 159] all filed on October 25, 2021, which responses are currently due
10 on November 22, 2021, to be extended an additional thirty days (30) days up to and including
11 December 22, 2021; and (2) all Defendants to file their Replies, currently due on December 13,
12 2021, to be extended to and including January 21, 2022.

13 Since the filing of the Motions for Summary Judgment, Plaintiffs’ counsel learned that she
14 will be in trial commencing on November 10, 2021, in the Eighth Judicial District Court, Case
15 Number A-17-760868-C, Errol Thompson v. Kathleen Benson, et al., lasting through the end of
16 November 2021. Additionally, the time allotted to respond to the four detailed and lengthy
17 motions is insufficient to be able to effectively articulate responses. As a result, Plaintiffs’ counsel
18 will not be able to respond to four (4) Motions for Summary Judgment by November 22, 2021.
19 Counsel for the Defendants have no objection to extending the deadline for Responses and further
20 stipulate to the date to reply to Plaintiffs’ Responses. This request for extension is made in good
21 faith and not for the purposes of delay.

22 WHEREFORE, the parties stipulate that the time for Plaintiffs to file their Response(s) to
23 Defendant Corrections Officer Castro’s Motion for Summary Judgment [Dkt 146], Defendant
24 Raynaldo-John Ramos’ Motion for Summary Judgment [Dkt 147], State of Nevada Ex Rel.
25 Nevada Department of Corrections, James “Greg” Cox, Timothy Filson, Dwight Neven and
26 Ronald Oliver’s Motion for Summary Judgment [Dkt 153], and Defendant Isaiah Smith’s Motion

27 //

28 //

1 for Summary Judgment [Dkt 159], be extended an additional thirty days (30) days up to and
2 including December 22, 2021 and the time for Defendants to file their Replies be extended to and
3 including January 21, 2022.

4 APPROVED AS TO FORM AND CONTENT.

5 Respectfully submitted this 5th day of November 2021.

6 **CLARK HILL, PLLC**

7 */s/ Paola M. Armeni, Esq.*

8
9 PAOLA M. ARMENI
10 Nevada Bar No. 8357
11 3800 Howard Hughes Pkwy., #500
12 Las Vegas, Nevada 89169
13 *Attorneys for Plaintiffs, Perez Family*

12 **MARQUIS AURBACH COFFING**

13 */s/ James A. Beckstrom, Esq.*

14
15 James A. Beckstrom, Esq.
16 Nevada Bar No. 14032
17 10001 Park Run Drive
18 Las Vegas, NV 89145
19 *Attorneys for Defendant Jeffrey Castro*

18 **ARMSTRONG TEASDALE**

19 */s/ Jeffrey F. Barr, Esq.*

20
21 Jeffrey F. Barr, Esq.
22 Nevada Bar No. 007269
23 3770 Howard Hughes Parkway, Suite 200
24 Las Vegas, NV 89169
25 *Attorneys for Defendant Isaiah Smith*

**LEWIS BRISBOIS BISGAARD &
SMITH LLP**

/s/ Robert W. Freeman, Jr., Esq.

Robert W Freeman, Jr., Esq.
Nevada Bar No. 003062
6385 S. Rainbow Blvd., Ste. 600
Las Vegas, NV 89118
Attorneys for Defendant Raynaldo Ramos

**OFFICE OF THE ATTORNEY
GENERAL**

/s/ Akke Levin, Esq.

Steven Shevorski, Esq.
Nevada Bar No. 008256
Akke Levin, Esq.
Nevada Bar No. 009102
100 N Carson St
Carson City, NV 89701
*Attorneys for Defendants, State of Nevada,
Dwight W. Neven, James Greg Cox
Ronald Oliver, Timothy Filson*

ORDER

25 **IT IS SO ORDERED:**

26 DATED: November 8, 2021

27
28 
UNITED STATES DISTRICT COURT JUDGE