Case 2:15-cv-01572-APG-DJA Document 169 Filed 12/14/21 Page 1 of 3 1 CLARK HILL PLLC PAOLA M. ARMENI Nevada Bar No. 3837 Email: pameni@clarkbill.com 3 3800 Howard Hughes Pkwy., #500 Las Vegas, Nevada 89169 Tel: (702) 862-8400 Attorneys for Plaintiffs, Perez Family VICTOR PEREZ, as Special Administrator of the Estate of CARLOS PEREZ, deceased; VICTOR PEREZ, as the Guardia Ad Litem for S.E.P., a minor, VICTOR PEREZ, as the Guardia Ad Litem for S.E.P., a minor, VICTOR PEREZ, as the Guardia Ad Litem for S.E.P., a minor, VICTOR PEREZ, as the Guardia Ad Litem for A.I.P., a minor, Plaintiffs, vs. STATE OF NEVADA, ex.rel. NEVADA DEPARTMENT OF CORRECTIONS; DIRECTOR GREG COX, individually; WARDEN DWIGHT NEVEN, individually; ASSISTANT WARDEN FIMOTHY FILSON, individually; CORRECTIONS OFFICER CASTRO, individually; CORRECTIONS OFFICER SMITH, individually; CORRECTIONS OFFICER SMITH, individually; AD DEFENDANT OLIVER, individually; Nevental Property of the law firm of Clark Hill, Defendant Raynaldo Ramos, by and through his counsel, Robert W. Freeman, Jr. Esq., of the law firm of Lewis Brisbois Bisgaard & Smith, LLP, Defendants, State of Nevada ex rel Nevada Department of Corrections, James Greg Cox. Timothy Filson, Dwight W. Neven and Ronald Oliver, by and through their counsel, Akke Levin, Esq., of the Attorney General's Office, Defendant Isaiah Smith, by and through his counsel of record Jeffrey F. Barr, Esq. of the law firm of Armstrong Teasdale, and Defendant Left Castro, by and through his counsel, James A, Beckstrom, Esq., of the law firm of Marquis Aurbach Coffing, hereby respectfully submit this Stipulation and Order Extending Time	Perez et al v. Cox e		Doc.	
PAOLA M. ARMENI Nevada Bar No. 8357 Email: parmeni@clarkhill.com 3800 Howard Hughes Pkwy, #500 Las Vegas, Nevada 89169 Tel: (702) 862-8300 Fax: (702) 862-8300 VICTOR PEREZ, as Special Administrator of the Estate of CARLOS PEREZ, act the Guardia Ad Litem for S.E.P., a minor, VICTOR PEREZ, as the Guardia Ad Litem for A.I.P., a minor, V		Case 2:15-cv-01572-APG-DJA Document 16	9 Filed 12/14/21 Page 1 01 3	
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2 Newada Bar No. 8357 Email: parmeni@clarkhill.com 3800 Howard Hughes Pkwy., #500 Las Vegas. Newada 89169 Tel: (702) 862-8400 Attorneys for Plaintiffs, Perex Family UNITED STATES DISTRICT COURT DISTRICT OF NEVADA VICTOR PEREZ, as Special Administrator of the Estate of CARLOS PEREZ, deceased; VICTOR PEREZ, as the Guardia Ad Litem for S.E.P., a minor; VICTOR PEREZ, as the Guardia Ad Litem for A.I.P., a minor. Plaintiffs, vs. STATE OF NEVADA, ex.rel. NEVADA DEPARTMENT OF CORRECTIONS: DIRECTOR GREG COX, individually; WARDEN DWIGHT NEVEN, individually; WARDEN DWIGHT NEVEN, individually; CORRECTIONS OFFICER CASTRO, individually; CORRECTIONS OFFICER CAST	1			
3 3800 Howard Hughes Pkwy., #500 Las Vegas, Nevada 89169 Tel: (702) 862-8300 Fax: (702) 862-8400 Attorneys for Plaintiffs, Perez Family UNITED STATES DISTRICT COURT DISTRICT OF NEVADA VICTOR PEREZ, as Special Administrator of the Estate of CARLOS PEREZ, deceased, VICTOR PEREZ, as the Guardia Ad Litem for S.E.P., a minor, VICTOR PEREZ, as the Guardia Ad Litem for S.E.P., a minor, VICTOR PEREZ, as the Guardia Ad Litem for A.I.P., a minor, VICTOR PEREZ, as the Guardia Ad Litem for A.I.P., a minor, VICTOR PEREZ, as the Guardia Ad Litem for A.I.P., a minor, VICTOR PEREZ, as the Guardia Ad Litem for A.I.P., a minor, VICTOR PEREZ, as the Guardia Ad Litem for A.I.P., a minor, VICTOR PEREZ, as the Guardia Ad Litem for A.I.P., a minor, VICTOR PEREZ, as the Guardia Ad Litem for A.I.P., a minor, VICTOR PEREZ, as the Guardia Ad Litem for A.I.P., a minor, VICTOR PEREZ, as the Guardia Ad Litem for A.I.P., a minor, VICTOR PEREZ, as the Guardia Ad Litem for A.I.P., a minor, VICTOR PEREZ, as the Guardia Ad Litem for A.I.P., a minor, VICTOR PEREZ, as the Guardia Ad Litem for A.I.P., a minor, VICTOR PEREZ, as the Guardia Ad Litem for A.I.P., a minor, VICTOR PEREZ, as the Guardia Ad Litem for S.I.P., a minor, VICTOR PEREZ, as the Guardia Ad Litem for S.I.P., a minor, VICTOR PEREZ, as the Guardia Ad Litem for S.I.P., a minor, VICTOR PEREZ, as the Guardia Ad Litem for S.I.P., a minor, VICTOR PEREZ, as the Guardia Ad Litem for S.I.P., a minor, VICTOR PEREZ, as the Guardia Ad Litem for S.I.P., a minor, VICTOR PEREZ, as the Guardia Ad Litem for S.I.P., a minor, vICTOR PEREZ, as the Guardia Ad Litem for S.I.P., a minor, vICTOR PEREZ, as the Guardia Ad Litem for S.I.P., a minor, vICTOR PEREZ, as the Guardia Ad Litem for S.I.P., a minor, vICTOR PEREZ, as the Guardia Ad Litem for S.I.P., a minor, vICTOR PEREZ, as the Guardia Ad Litem for S.I.P., a minor, vICTOR PEREZ, as the Guardia Ad Litem for S.I.P., a minor, vICTOR PEREZ, as the Guardia Ad Litem for S.I.P., a minor, vICTOR PEREZ, as the Guardia Ad Litem for S.I.P., a minor, vICTOR P	2			
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STATE OF NEVADA, ex.rel. NEVADA DEPARTMENT OF CORRECTIONS; DIRECTOR GREG COX, individually; WARDEN DWIGHT NEVEN, individually; ASSISTANT WARDEN TIMOTHY FILSON, individually; COT. RAMOS, individually; CORRECTIONS OFFICER CASTRO, individually; CORRECTIONS OFFICER SMITH, individually; and DOES I-X, inclusive; and ROES I-X, inclusive, Defendants. Victor Perez, as Special Administrator of the Estate of Carlos Perez, deceased, by and through his counsel, Paola M. Armeni, Esq., of the law firm of Clark Hill, Defendant Raynaldo Ramos, by and through his counsel, Robert W. Freeman, Jr. Esq., of the law firm of Lewis Brisbois Bisgaard & Smith, LLP, Defendants, State of Nevada ex rel Nevada Department of Corrections, James Greg Cox, Timothy Filson, Dwight W. Neven and Ronald Oliver, by and through their counsel, Akke Levin, Esq., of the Attorney General's Office, Defendant Isaiah Smith, by and through his counsel of record Jeffrey F. Barr, Esq. of the law firm of Armstrong Teasdale, and Defendant Jeff Castro, by and through his counsel, James A. Beckstrom, Esq., of the law firm of	12	<u>'</u>		
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ASSISTANT WARDEN TIMOTHY FILSON, individually; COT. RAMOS, individually; COT. RAMOS, individually; CORRECTIONS OFFICER CASTRO, individually; CORRECTIONS OFFICER SMITH, individually; and DOES I-X, inclusive; and ROES I-X, inclusive, Defendants. Victor Perez, as Special Administrator of the Estate of Carlos Perez, deceased, by and through his counsel, Paola M. Armeni, Esq., of the law firm of Clark Hill, Defendant Raynaldo Ramos, by and through his counsel, Robert W. Freeman, Jr. Esq., of the law firm of Lewis Brisbois Bisgaard & Smith, LLP, Defendants, State of Nevada ex rel Nevada Department of Corrections, James Greg Cox, Timothy Filson, Dwight W. Neven and Ronald Oliver, by and through their counsel, Akke Levin, Esq., of the Attorney General's Office, Defendant Isaiah Smith, by and through his counsel of record Jeffrey F. Barr, Esq. of the law firm of Armstrong Teasdale, and Defendant Jeff Castro, by and through his counsel, James A. Beckstrom, Esq., of the law firm of	14			
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Bisgaard & Smith, LLP, Defendants, State of Nevada ex rel Nevada Department of Corrections, James Greg Cox, Timothy Filson, Dwight W. Neven and Ronald Oliver, by and through their counsel, Akke Levin, Esq., of the Attorney General's Office, Defendant Isaiah Smith, by and through his counsel of record Jeffrey F. Barr, Esq. of the law firm of Armstrong Teasdale, and Defendant Jeff Castro, by and through his counsel, James A. Beckstrom, Esq., of the law firm of	22	through his counsel, Paola M. Armeni, Esq., of the law firm of Clark Hill, Defendant Raynaldo		
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Defendant Jeff Castro, by and through his counsel, James A. Beckstrom, Esq., of the law firm of	26			
28	27	Defendant Jeff Castro, by and through his counsel, James A. Beckstrom, Esq., of the law firm of		
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Doc. 169

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for: (1) Plaintiff to Respond to Defendant Corrections Officer Castro's Motion for Summary Judgment [Dkt 146], Defendant Raynaldo-John Ramos' Motion for Summary Judgment [Dkt 147], State of Nevada Ex Rel. Nevada Department of Corrections, James "Greg" Cox, Timothy Filson, Dwight Neven and Ronald Oliver's Motion for Summary Judgment [Dkt 153], and Defendant Isaiah Smith's Motion for Summary Judgment [Dkt 159] all filed on October 25, 2021, which responses are currently due on December 22, 2021, to be extended up to and including January 5, 2022; and (2) all Defendants to file their Replies, currently due on January 21, 2021, to be extended to and including February 4, 2022.

The law firm of Plaintiff's counsel has experienced some unexpected personnel changes. Those personnel changes directly affect the work being done on the Plaintiff's case. As such, Plaintiff's counsel requested a two week extension to file the four Responses to the Defendants' Motions for Summary Judgment. Counsel for the Defendants have no objection to extending the deadline for Responses and the parties further stipulate to extend the date to reply to Plaintiffs' Responses. This request for extension is made in good faith and not for the purposes of delay.

WHEREFORE, the parties stipulate that the time for Plaintiffs to file their Response(s) to Defendant Corrections Officer Castro's Motion for Summary Judgment [Dkt 146], Defendant Raynaldo-John Ramos' Motion for Summary Judgment [Dkt 147], State of Nevada Ex Rel. Nevada Department of Corrections, James "Greg" Cox, Timothy Filson, Dwight Neven and Ronald Oliver's Motion for Summary Judgment [Dkt 153], and Defendant Isaiah Smith's Motion for Summary Judgment [Dkt 159], be extended for two weeks up to and including January 5, 2022 and the time for Defendants to file their Replies be extended to and including February 4. 2022. Respectfully submitted this 13th day of December 2021.

CLARK HILL, PLLC

MARQUIS AURBACH COFFING

24	/s/ Paola M. Armeni, Esq.	/s/ James A. Beckstrom, Esq.
25	PAOLA M. ARMENI	James A. Beckstrom, Esq.
26	Nevada Bar No. 8357 3800 Howard Hughes Pkwy., #500	Nevada Bar No. 14032 10001 Park Run Drive
27	Nevada Bar No. 8357 3800 Howard Hughes Pkwy., #500 Las Vegas, Nevada 89169 Attorneys for Plaintiffs, Perez Family	Las Vegas, NV 89145 Attorneys for Defendant Jeffrey Castro

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1	ARMSTRONG TEASDALE	
2	/s/ Jeffrey F. Barr, Esq.	OFFICE OF THE ATTORNEY GENERAL
3 4 5 6 7 8 9 10 11 12	Jeffrey F. Barr, Esq. Nevada Bar No. 007269 3770 Howard Hughes Parkway, Suite 200 Las Vegas, NV 89169 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	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
13 14		<u>ORDER</u>
15	IT IS SO ORDERED:	
16 17	DATED: December 14, 2021	
18		UNITED STATES DISTRICT COURT JUDGE CASE NO.: 2:15-cv-01572-APG-DJA
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