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6 **UNITED STATES DISTRICT COURT**
 7 **DISTRICT OF NEVADA**

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

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

11 Plaintiffs,

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

12 vs.

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

19 Defendants.

20 Victor Perez, as Special Administrator of the Estate of Carlos Perez, deceased, by and
 21 through his counsel, Paola M. Armeni, Esq., of the law firm of Clark Hill, Defendant Raynaldo
 22 Ramos, by and through his counsel, Robert W. Freeman, Jr. Esq., of the law firm of Lewis Brisbois
 23 Bisgaard & Smith, LLP, Defendants, State of Nevada ex rel Nevada Department of Corrections,
 24 James Greg Cox, Timothy Filson, Dwight W. Neven and Ronald Oliver, by and through their
 25 counsel, Akke Levin, Esq., of the Attorney General’s Office, Defendant Isaiah Smith, by and
 26 through his counsel of record Jeffrey F. Barr, Esq. of the law firm of Armstrong Teasdale, and
 27 Defendant Jeff Castro, by and through his counsel, James A. Beckstrom, Esq., of the law firm of
 28 Marquis Aurbach Coffing, hereby respectfully submit this Stipulation and Order Extending Time

1 for: (1) Plaintiff to Respond to Defendant Corrections Officer Castro’s Motion for Summary
2 Judgment [Dkt 146], Defendant Raynaldo-John Ramos’ Motion for Summary Judgment [Dkt
3 147], State of Nevada Ex Rel. Nevada Department of Corrections, James “Greg” Cox, Timothy
4 Filson, Dwight Neven and Ronald Oliver’s Motion for Summary Judgment [Dkt 153], and
5 Defendant Isaiah Smith’s Motion for Summary Judgment [Dkt 159] all filed on October 25, 2021,
6 which responses are currently due on December 22, 2021, to be extended up to and including
7 January 5, 2022; and (2) all Defendants to file their Replies, currently due on January 21, 2021, to
8 be extended to and including February 4, 2022.

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

15 WHEREFORE, the parties stipulate that the time for Plaintiffs to file their Response(s) to
16 Defendant Corrections Officer Castro’s Motion for Summary Judgment [Dkt 146], Defendant
17 Raynaldo-John Ramos’ Motion for Summary Judgment [Dkt 147], State of Nevada Ex Rel.
18 Nevada Department of Corrections, James “Greg” Cox, Timothy Filson, Dwight Neven and
19 Ronald Oliver’s Motion for Summary Judgment [Dkt 153], and Defendant Isaiah Smith’s Motion
20 for Summary Judgment [Dkt 159], be extended for two weeks up to and including January 5,
21 2022 and the time for Defendants to file their Replies be extended to and including February 4,
22 2022. Respectfully submitted this 13th day of December 2021.

23 **CLARK HILL, PLLC**

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

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Ronald Oliver, Timothy Filson*

ORDER

IT IS SO ORDERED:

DATED: December 14, 2021



UNITED STATES DISTRICT COURT JUDGE
CASE NO.: 2:15-cv-01572-APG-DJA

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