Perez et al v. Cox et al Doc. 199

CLARK HILL PLLC 1 PAOLA M. ARMENI 2 Nevada Bar No. 8357 Email: parmeni@clarkhill.com 3 3800 Howard Hughes Pkwy., #500 GIA N. MARINA 4 Nevada Bar No. 15276 Email: gmarina@clarkhill.com 5 Las Vegas, Nevada 89169 Tel: (702) 862-8300 6 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 CASE NO.: 2:15-cv-01572-APG-DJA 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, STIPULATION AND ORDER TO 13 Plaintiffs, EXTEND DEADLINE FOR PLAINTIFFS' TO FILE A RESPONSE TO DEFENDANT vs. 14 ISAIAH SMITH'S OBJECTION TO PLAINTIFFS' EVIDENCE IN SUPPORT STATE OF NEVADA, ex.rel. NEVADA 15 DEPARTMENT OF CORRECTIONS: OF RESPONSE TO MOTION FOR DIRECTOR GREG COX, individually; SUMMARY JUDGEMENT [DKT 194] 16 WARDEN DWIGHT NEVEN, individually; ASSISTANT WARDEN TIMOTHY FILSON, 17 individually; COT. RAMOS, individually; LIEUTENANT OLIVER, individually: 18 CORRECTIONS OFFICER CASTRO, individually; CORRECTIONS OFFICER 19 SMITH, individually; and DOES I-X, inclusive; and ROES I-X, inclusive, 20 Defendants. 21 Victor Perez, as Special Administrator of the Estate of Carlos Perez, deceased, by and 22 through his counsel, Paola M. Armeni, Esq. and Gia N. Marina, Esq., of the law firm of Clark Hill 23 and Defendant Isaiah Smith, by and through his counsel of record Jeffrey F. Barr, Esq. of the law 24

Victor Perez, as Special Administrator of the Estate of Carlos Perez, deceased, by and through his counsel, Paola M. Armeni, Esq. and Gia N. Marina, Esq., of the law firm of Clark Hill and Defendant Isaiah Smith, by and through his counsel of record Jeffrey F. Barr, Esq. of the law firm of Armstrong Teasdale, hereby respectfully submit this Stipulation and Order Extending Time for Plaintiff to Respond to Defendant Isaiah Smith's Objections to Plaintiffs' Evidence in Support of Response to Motion for Summary Judgement [Dkt 194] filed on February 18, 2022, which the response is currently due on March 4, 2022, to be extended an additional fourteen (14) days up to and including March 18, 2022.

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1	Although Plaintiffs' counsel has been actively working on responding to Defendant's	
2	Objection, counsel requires a brief extension to complete the Response. This request for extension	
3	is made in good faith and not for the purposes of delay.	
4	WHEREFORE, the parties stipulate that the time for Plaintiffs to file their Response to	
5	Defendant Isaiah Smith's Objections to Plaintiffs' Evidence in Support of Response to Motion for	
6	Summary Judgement [Dkt 194], be extended an additional fourteen (14) days up to and including	
7	March 18, 2022.	
8	APPROVED AS TO FORM AND CONTENT.	
9	Respectfully submitted this 3rd day of March 2022.	
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11	CLARK HILL, PLLC	ARMSTRONG TEASDALE
12	/s/ Paola M. Armeni, Esq.	/s/ Jeffrey F. Barr, Esq.
13	PAOLA M. ARMENI	Jeffrey F. Barr, Esq.
14	Nevada Bar No. 8357 3800 Howard Hughes Pkwy., #500	Nevada Bar No. 007269 3770 Howard Hughes Parkway, Suite 200
15	Las Vegas, Nevada 89169 Attorneys for Plaintiffs, Perez Family	Las Vegas, NV 89169 Attorneys for Defendant Isaiah Smith
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19	<u>ORDER</u>	
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21	IT IS SO ORDERED:	
22	DATED: <u>March 4, 2022</u>	
23		UNITED STATES DISTRICT COURT JUDGE
24		UNITED STATES DISTRICT COURT JUDGE
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