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8 *Attorneys for Defendant Corrections Officer Isaiah Smith*

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

11 VICTOR PEREZ, as Special Administrator of
 12 the Estate of CARLOS PEREZ, deceased;
 13 VICTOR PEREZ, as the Guardian Ad Litem for
 SOPHIA ELISE PEREZ, a minor; VICTOR
 14 PEREZ, as the Guardian Ad Litem for
 ALEXANDER ISRYAL PEREZ, a minor; and
 MYRA PEREZ, individually,

15 Plaintiff,

16 v.

17 STATE OF NEVADA; DIRECTOR GREG
 18 COX, individually; WARDEN DWIGHT
 NEVEN, individually; ASSISTANT WARDEN
 19 TIMOTHY FILSON, individually; COT.
 RAMOS, individually; LIEUTENANT
 20 OLIVER, individually; CORRECTIONS
 OFFICER CASTRO, individually;
 21 CORRECTIONS OFFICER SMITH,
 individually; and DOES 1-X, inclusive; and
 22 ROES 1-X, inclusive,

23 Defendants.

Case No.: 2:15-CV-01572-APG-DJA

24 **STIPULATION AND ORDER TO**
EXTEND DEADLINE FOR
SUBMISSION OF JOINT PRETRIAL
ORDER
 (Third Request)

25 Pursuant to LR IA 6-1, 6-2 and LR 26-4, Defendant Isaiah Smith, by and through his counsel
 26 of record Jeffrey F. Barr, Esq. and Alina M. Shell of the law firm of Armstrong Teasdale LLP;
 27 Plaintiff Victor Perez, as Special Administrator of the Estate of Carlos Perez, deceased, by and
 28 through his counsel, Paola M. Armeni, Esq., of the law firm of Clark Hill; Defendants, State of

1 Nevada ex rel Nevada Department of Corrections, James Greg Cox, Timothy Filson, Dwight W.
2 Neven and Ronald Oliver, by and through their counsel, Kiel Ireland, Esq., of the Attorney General's
3 Office; Defendant Raynaldo Ramos, by and through his counsel, Robert W. Freeman, Jr. Esq., of the
4 law firm of Lewis Brisbois Bisgaard & Smith, LLP; and Defendant Jeff Castro, by and through his
5 counsel, Craig R. Anderson, Esq., of the law firm of Marquis Aurbach Chtd., hereby respectfully
6 submit this Stipulation and Order Extending the Deadline for Submission of Joint Pretrial Order
7 currently due on November 10, 2022 an additional thirty (30) days, up to and including December 12,
8 2022.

9 This Court previously denied a joint unopposed motion to extend the deadline for submission
10 of the Joint Pretrial Order on September 19, 2022, and then granted a modified version of the same
11 request [ECF No. 221, 223.] Hence, this is the third request for an extension.

12 This stipulated request for an extension is made in good faith and not for the purposes of
13 delay. Counsel for Defendant Jeff Castro is currently out of the jurisdiction through November 11,
14 2022 and will be traveling on the week of November 14, 2022 for an oral argument before the United
15 States Court of Appeals for the Ninth Circuit. Counsel for Defendants State of Nevada ex rel Nevada
16 Department of Corrections, James Greg Cox, Timothy Filson, Dwight W. Neven and Ronald Oliver
17 also require additional time due to recent changes in representation, as former counsel Steven
18 Shevorski, Esq. and Akke Levin, Esq. are no longer with the Attorney General's office. Further,
19 current senior counsel for Defendants State of Nevada ex rel Nevada Department of Corrections,
20 James Greg Cox, Timothy Filson, Dwight W. Neven and Ronald Oliver is currently the Attorney
21 General's point person for election litigation and is therefore unable to review and provide additions
22 to the joint pretrial order before the current November 10, 2022 deadline.

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1 WHEREFORE the parties stipulate that the time for parties to submit the joint pretrial order
2 be extended an additional thirty (3) days, up to and including December 12, 2022.

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4 **IT IS SO ORDERED:**

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6 _____
UNITED STATES MAGISTRATE JUDGE

7 DATED: November 14, 2022.

8 **ARMSTRONG TEASDALE LLP**

9 /s/ Alina M. Shell

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13 **CLARK HILL PLLC**

14 /s/ Paola M. Armeni

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17 **LEWIS BRISBOIS BISGAARD & SMITH**

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22 **AARON FORD, Attorney General**

23 /s/ Kiel Ireland

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*Attorneys for Defendants State of Nevada,
Dwight Neven, James Greg Cox, Ronald
Oliver and Timothy Filson*

27 **MARQUIS & AURBACH**

28 /s/ Craig R. Anderson

Craig R. Anderson, Nev. Bar No. 6882
10001 Park Run Drive
Las Vegas, NV 89145
Attorneys for Defendant Castro

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 10th day of November 2022, **I SERVED A TRUE AND CORRECT COPY OF THE FORGOING STIPULATION AND ORDER TO EXTEND DEADLINE FOR SUBMISSION OF JOINT PRETRIAL ORDER (Third Request)** was submitted with the clerk of the court through case management/electronic filing system.

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/s/ Allie Villarreal
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