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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;  
 and ROES I-X, inclusive,

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

**STIPULATION AND ORDER TO  
 EXTEND DEADLINE FOR  
 PLAINTIFFS TO FILE A REPLY TO  
 NDOC DEFENDANTS' RESPONSE TO  
 PEREZ FAMILY'S MOTION TO  
 RECONSIDER ORDER GRANTING  
 DEFENDANTS' MOTION FOR  
 SUMMARY JUDGMENT ON  
 PLAINTIFFS' FOURTEENTH  
 AMENDMENT LOSS OF FAMILIAL  
 ASSOCIATION CLAIM**

22 Victor Perez, as Special Administrator of the Estate of Carlos Perez, deceased, by and  
 23 through his counsel, Paola M. Armeni, Esq., and Gia N. Marina, Esq., the law firm of Clark Hill,  
 Defendant Raynaldo Ramos, by and through his counsel, Robert W. Freeman, Jr. Esq., the law  
 24 firm of Lewis Brisbois Bisgaard & Smith, LLP, Defendants, State of Nevada ex rel Nevada  
 25 Department of Corrections, James Greg Cox, Timothy Filson, Dwight W. Neven and Ronald  
 26 Oliver, by and through their counsel, Craig Newby, Esq. and Kiel Ireland, Esq., the Attorney  
 27 General's Office, Defendant Isaiah Smith, by and through his counsel of record, Jeffrey F. Barr,  
 28 Esq., and Alina Shell, Esq. of the law firm of Armstrong Teasdale, and Defendant Jeff Castro, by

1 and through his counsel, Craig R. Anderson, Esq., of the law firm of Marquis Aurbach, hereby  
2 respectfully submit this Stipulation and Order Extending Time for Plaintiff to reply to NDOC  
3 Defendants' Response to Perez Family's Motion to Reconsider Order Granting Defendants'  
4 Motion for Summary Judgment on Plaintiffs' Fourteenth Amendment Loss of Familial  
5 Association Claim [Dkt 232] filed on December 12, 2022, which the response is currently due on  
6 December 19, 2022, to be extended an additional eight (8) days up to and including December 27,  
7 2022.

8 Although Plaintiffs' counsel has begun working on replying to Defendant's Response,  
9 counsel requires a brief extension to complete the Reply. This request for extension is made in  
10 good faith and not for the purposes of delay.

11 WHEREFORE, the parties stipulate that the time for Plaintiffs to file their reply to NDOC  
12 Defendants' Response to Perez Family's Motion to Reconsider Order Granting Defendants'

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Motion for Summary Judgment on Plaintiffs’ Fourteenth Amendment Loss of Familial Association Claim [Dkt 232], be extended an additional eight (8) days up to and including December 27, 2022.

APPROVED AS TO FORM AND CONTENT.

Respectfully submitted this 15th day of December 2022.

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Ronald Oliver, Timothy Filson*

**ORDER**

**IT IS SO ORDERED:**



UNITED STATES DISTRICT JUDGE

DATED: December 16, 2022