

1 Malani Dale Kotchka-Alanes  
 Nevada Bar No. 13168  
 2 E-Mail: [mkotchkaalanes@lrrc.com](mailto:mkotchkaalanes@lrrc.com)  
 3 **Lewis Roca Rothgerber Christie LLP**  
 3993 Howard Hughes Parkway, Suite 600  
 4 Las Vegas, Nevada 89169-5996  
 Tel: (702) 949-8258  
 5 Fax: (702) 949-8398

6 *Attorney for Plaintiff Charon L. Brown*

7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9  
 10 CHARON L. BROWN,  
 11 Plaintiff,  
 12 vs.  
 13 OFFICER MECHAM, et al.,  
 14 Defendants.

CASE NO.: 2:15-CV-01670-APG-NJK  
  
**STIPULATION TO EXTEND RULE 60  
 MOTION DEADLINE (SECOND REQUEST)**

15  
 16 Former Defendant NaphCare, Inc. (“NaphCare”), and Plaintiff Charon Brown stipulate as  
 17 follows:

- 18 1. Whereas the Court granted NaphCare’s original motion to dismiss on June 1, 2016 (ECF  
 19 No. 22 (Order Granting ECF No. 12));
- 20 2. Whereas Malani Dale Kotchka-Alanes was appointed as pro bono counsel for Plaintiff  
 21 Charon Brown on March 28, 2017;
- 22 3. Whereas Plaintiff issued a subpoena for NaphCare to testify at a deposition scheduled for  
 23 May 30, 2017;
- 24 4. Whereas Plaintiff and NaphCare agreed to reschedule the deposition to accommodate the  
 25 parties’ and counsels’ schedules;
- 26 5. Whereas Plaintiff and NaphCare previously stipulated to extend the Rule 60 motion  
 27 deadline to July 13, 2017, which the Court granted (ECF Nos. 111 and 112);
- 28 6. Whereas the 30(b)(6) deposition of NaphCare will not be able to take place until later than

3993 Howard Hughes Pkwy, Suite 600  
Las Vegas, NV 89169-5996

**Lewis Roca**  
ROTHGERBER CHRISTIE

1 anticipated due to the travel and work schedules of (1) NaphCare's 30(b)(6) witness, (2)  
2 NaphCare's counsel, and (3) counsel for Las Vegas Metropolitan Police Department  
3 Defendants Mecham, Kegley, and Sands;

- 4 7. Therefore, NaphCare and Plaintiff agree to extend the Rule 60 motion deadline to August  
5 11, 2017.

6 Dated this 14th day of June, 2017.

7 **LEWIS ROCA ROTHGERBER CHRISTIE LLP**

8 By: /s/ Malani Dale Kotchka-Alanes

9 MALANI DALE KOTCHKA-ALANES

10 Nevada Bar No. 13168

11 3993 Howard Hughes Pkwy., Suite 600

12 Las Vegas, NV 89169-5996

13 *Attorney for Plaintiff Charon L. Brown*

14 **ALVERSON, TAYLOR, MORTENSEN &  
15 SANDERS**

16 By: /s/ Michael T. McLoughlin

17 MICHAEL T. MCLOUGHLIN

18 Nevada Bar No. 012820

19 SHIRLEY BLAZICH

20 Nevada Bar No. 008378

21 7401 W. Charleston Blvd.

22 Las Vegas, NV 891117

23 *Attorneys for Former Defendant NaphCare, Inc.*

24 **IT IS SO ORDERED:**

25   
UNITED STATES MAGISTRATE JUDGE

26 Dated: June 15, 2017