

NICHOLAS A. TRUTANICH

United States Attorney

District of Nevada

Nevada Bar No. 13644

TROY K. FLAKE

Deputy Civil Chief

501 Las Vegas Boulevard South, Suite 1100

Las Vegas, Nevada 89101

Telephone: 702-388-6336

Facsimile: 702-388-6787

Email: troy.flake@usdoj.gov

EUGENE N. HANSEN

JOHANNA M. FRANZEN

ANTHONY C. GENTNER

MARK C. ELMER

Trial Attorneys, U.S. Department of Justice

Environment & Natural Resources Division

P.O. Box 7611, Ben Franklin Station

Washington, DC 20044-7611

Telephone: 202-305-0301

Facsimile: 202-514-8865

Email: eugene.hansen@usdoj.gov

johanna.franzen@usdoj.gov

anthony.gentner@usdoj.gov

mark.elmer@usdoj.gov

*Attorneys for the United States*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

400 ACRES OF LAND, more or less,  
situate in Lincoln County, State of Nevada;  
and JESSIE J. COX, et al.,

Defendants.

Case No. 2:15-cv-01743-MMD-NJK

**STIPULATION TO EXTEND TIME TO  
FILE OPPOSITION AND REPLY TO  
ECF NO. 545 (First Request)**

1 Pursuant to LR IA 6-1, Plaintiff United States of America and Defendant Sheahan  
2 Landowners hereby stipulate to a one-week extension (to December 6, 2019) for the United  
3 States to file an opposition to the Sheahan Landowners' Motion, ECF No. 545. The United States  
4 and Sheahan Landowners further stipulate to a corresponding one-week extension (from one  
5 week to two weeks) for the Sheahan Landowners to file a reply in support of ECF No. 545. In  
6 support of this stipulation, the parties state:

7 1. On November 15, 2019, the Sheahan Landowners filed a Motion for Leave to  
8 Provide Offer of Proof on the Qualtrics 1 and 2 Surveys Through Live Testimony In Question-  
9 And-Answer Format Pursuant to Federal Rules of Evidence Rule 103(c) ("ECF No. 545").

10 2. The current deadline for filing an opposition to ECF No. 545 is November 29,  
11 2019, the day after Thanksgiving.

12 3. Counsel for both parties are planning to take time off to celebrate the  
13 Thanksgiving Holiday.

14 4. In order to avoid filing during Thanksgiving week, the parties agree to extend the  
15 time for the United States to file an opposition to ECF No. 545 to December 6, 2019.

16 5. In light of the one-week extension provided the United States, the parties further  
17 agree to a corresponding one-week extension (i.e. from one week to two weeks) for the Sheahan  
18 Landowners to file a reply, making the reply deadline December 20, 2019.

19 6. This is the first stipulation for extension of time to file an opposition or reply to  
20 ECF No. 545.

21 Respectfully submitted,

22  
23 **FOR THE UNITED STATES OF AMERICA**

24  
25 /s/ Mark C. Elmer  
26 EUGENE HANSEN  
27 JOHANNA M. FRANZEN  
28 ANTHONY GENTNER  
MARK C. ELMER  
Trial Attorneys  
U.S. Department of Justice


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**FOR THE SHEAHAN LANDOWNERS**

/s/ Autumn L. Waters  
KERMITT L. WATERS, Bar No. 2571  
JAMES J. LEAVITT, Bar No. 6032  
MICHAEL A. SCHNEIDER, Bar No. 8887  
AUTUMN L. WATERS, Bar No. 8917  
704 South Ninth Street  
Las Vegas, Nevada 89101  
Telephone: (702) 733-8877  
Email: jim@kermittwaters.com

*Counsel for Defendant Sheahan Landowners*

**IT IS SO ORDERED:**

  
\_\_\_\_\_  
Miranda Du  
United States District Judge

Dated: November 21, 2019

**CERTIFICATE OF SERVICE**

I hereby certify that on November 21, 2019, I served the foregoing Stipulation to Extend Time to File Opposition and Reply to ECF No. 545 on all parties who have appeared in this action using the Court's case management/electronic case filing system. In addition, I hereby certify that on November 21, 2019 the United States sent a copy of the foregoing Stipulation to Extend Time to File Opposition to ECF No. 545 via U.S. mail to the following defendants:

Sandra Sears-Lavallee  
1172 Skyline Road  
Henderson, NV 89002

John B. Sheahan  
Address unknown

Deborah Lynn Sheahan  
4662 Gabriel Drive  
Las Vegas, NV 89121

Diane Sibley-Origlia  
1615 Via Romero  
Alamo, CA 94507

Katherine Kell  
c/o Stanley Pedder  
3445 Golden Gate Way  
Lafayette, CA 94549

Debbie DeVito  
c/o Stanley Pedder  
3445 Golden Gate Way  
Lafayette, CA 94549  
Melanie Goodpasture  
P.O. Box 7044  
Cotati, CA 94931

House Rabbit Society  
c/o Anne Martin (Registered Agent)  
148 Broadway  
Richmond, CA 94804

Animal Place  
c/o Kim Sturla (Registered Agent)  
17314 McCourtney Road  
Grass Valley, CA 95949

Hui Chu Poole  
165 Lakewood Road  
Walnut Creek, CA 94598

Amy Sears  
P.O. Box 71  
Pioche, NV 89043

/s/ Mark C. Elmer  
MARK C. ELMER