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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MY LEFT FOOT CHILDREN'S THERAPY,
LLC; JOHN GOTTLIEB AND ANN MARIE
GOTTLIEB,

Plaintiffs

V.

CERTAIN UNDERWRITERS AT LLOYD'S
LONDON SUBSCRIBING TO POLICY NO.
HAH15-0632,

Defendant.

Case No. 2:15-cv-01746-MMD-VCF

**JOINT MOTION TO EXTEND
MOTION FOR LEAVE TO AMEND
BRIEFING DEADLINES**

1 Pursuant to LR 26-4, the Parties jointly stipulate to and request the extension of
2 briefing deadlines in connection with the Parties' respective pending or soon to be filed
3 Motions for Leave to Amend. As grounds for this request, the Parties state as follows:

4 1. The current Discovery Plan and Scheduling Order [ECF No. 159] was entered
5 on July 10, 2020 ("Scheduling Order"). Under the Scheduling Order, the deadline to file
6 motions to compel was October 30, 2020; and Plaintiffs' deadline to file a motion to further
7 amend their pleadings is November 16, 2020. ECF No. 159 at ¶ 3(d), (g).

8 2. Defendants filed two motions to compel on October 30, 2020. ECF Nos. 169,
9 170. Under LR 7-2, the deadline for Plaintiffs' responses is Friday, November 13, 2020; and
10 the deadline for Defendants' replies is Friday, November 20, 2020.

11 3. Defendants also filed a *Motion for Leave to File a First Amended Answer to*
12 *Plaintiffs' First Amended Complaint to Add Counterclaims* on November 2, 2020. ECF No.
13 171. Under LR 7-2, the deadline for Plaintiffs' response is Monday, November 16, 2020; and
14 the deadline for Defendants' reply is Monday, November 23, 2020.

15 4. Plaintiffs plan to file a Motion for Leave to Amend their pleading by Monday,
16 November 16, 2020. Under LR 7-2, if that motion is filed on November 16, then the deadline
17 for Defendants' response would be Monday, November 30, 2020; and the deadline for
18 Plaintiffs' reply would be Monday, December 7, 2020.

19 5. As such, the Parties collectively have nine briefs due between November 13,
20 2020 and December 7, 2020 – a time period that also includes the Thanksgiving Holiday.

1 6. For these reasons, there is good cause to extend the deadlines for the briefing in
2 connection with the Parties' respective Motions for Leave to Amend;¹ and the Parties
3 respectfully move the Court to extend those briefing deadlines as follows:

4 a. Plaintiffs' *Response to Defendants' Motion for Leave to Amend* must be
5 filed by **November 23, 2020**;

6 b. Defendants' *Reply in Support of Motion for Leave to Amend* must be filed by
7 **December 2, 2020**;

8 c. Defendants' *Response to Plaintiffs' Motion for Leave to Amend* must be
9 filed by **December 9, 2020**;

10 d. Plaintiffs' *Reply in Support of Motion for Leave to Amend* must be filed by
11 **December 16, 2020**.

12 WHEREFORE the Parties request that the Court allow this stipulation and extend the
13 Motion for Leave to Amend briefing deadlines as set forth above.

14 DATED this 10th day of November 2020.

15 **MARQUIS AURBACH COFFING**

16 By: /s/ Craig R. Anderson

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21 *Attorneys for Plaintiffs My Left Foot Children's
22 Therapy, LLC, Jon Gottlieb, and Ann Marie
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24 **AKIN GUMP STRAUSS HAUER & FELD
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34 Left Foot Children's Therapy, LLC, Jon
35 Gottlieb, and Ann Marie Gottlieb*

36

¹ The Parties do not seek to extend the deadlines in connection with the Motions to Compel.

1 **CHASNOFF MUNGIA VALKENAAR PEPPING**
2 **& STRIBLING LLP**

3 By: /s/ Barry A. Chasnoff

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14 *Attorneys pro hac vice for Defendant Certain
15 Underwriters at Lloyd's London Subscribing
16 to Policy No. HAH15-0632*

17 IT IS SO ORDERED.



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CERTIFICATE OF SERVICE

I hereby certify that I am an employee of CHASNOFF MUNGIA VALKENAAR PEPPING & STRIBLING LLP, and that on this day November 10, 2020, a true and correct copy of the foregoing **JOINT MOTION TO EXTEND MOTION FOR LEAVE TO AMEND BRIEFING DEADLINES** was served via electronic means by operation of the Court's electronic filing system, upon each party in this case who is registered as an electronic case filing user with the Clerk:

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