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14 **UNITED STATES DISTRICT COURT**  
 15 **FOR THE DISTRICT OF NEVADA**

16 MY LEFT FOOT CHILDREN'S  
 THERAPY, LLC; JON GOTTLIEB AND  
 17 ANN MARIE GOTTLIEB,  
 18 Plaintiffs,  
 19 v.  
 20 CERTAIN UNDERWRITERS AT  
 LLOYD'S LONDON SUBSCRIBING TO  
 21 POLICY NO. HAH15-0632,  
 22 Defendant.

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

**JOINT STIPULATION TO MODIFY  
 BRIEFING SCHEDULE**

23  
 24 Plaintiffs My Left Foot Children's Therapy, LLC, John Gottlieb and Ann Marie Gottlieb  
 25 ("Plaintiff") and Defendant Underwriters at Lloyd's London Subscribing to Policy No. HAH15-0632  
 26 ("Defendant") (together with Plaintiffs, the "parties") jointly submit this Stipulation to modify the  
 27 time Defendant has to file a response in opposition to Plaintiffs' Motion for Partial Summary Judgment

1 (ECF No. 240, which was filed September 21, 2021 (the “MPSJ”), and the time Plaintiffs have to file  
2 a reply in support of their MPSJ. In support thereof, the parties state as follows:

3 WHEREAS, under Local Rule 7-2, Defendant’s deadline to file a response to the MPSJ is  
4 October 12, 2021, and Plaintiffs’ deadline to file a reply in support of the MPSJ is 14 days after service  
5 of the response;

6 WHEREAS, both parties’ counsel has been affected by significant medical issues and personal  
7 conflicts since September (*see* ECF No. 243);

8 WHEREAS, Plaintiffs have conferred with counsel for Defendant regarding the above, and  
9 requested that: (1) the deadline for Defendant to file its response to Plaintiffs’ MPSJ be moved to  
10 October 26, 2021, and (2) the reply in support of Plaintiffs’ MPSJ be moved to November 16, 2021;

11 WHEREAS, there is good cause to extend the MPSJ briefing deadlines, and this stipulation is  
12 made in good faith, and not for some impermissible purpose such as to harass, delay, or prejudice;

13 WHEREAS, this is the parties’ first request to extend the briefing deadlines;

14 NOW, THEREFORE, the parties request that the Court enter an order extending the briefing  
15 schedule for Plaintiffs’ MPSJ, so that Defendant’s Opposition is due on October 26, 2021, and  
16 Plaintiffs’ Reply is due November 16, 2021.

1 Respectfully submitted,

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*Counsel for Plaintiffs My Left Foot  
Children's Therapy, LLC, Jon  
Gottlieb, and Ann Marie Gottlieb*

16 IT IS SO ORDERED.

17 

18 MIRANDA M. DU  
19 UNITED STATES DISTRICT JUDGE  
20 DATED: October 8, 2021

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I am an employee of CHASNOFF MUNGIA VALKENAAR PEPPING & STRIBLING  
3 LLP, and that on this day October 8, 2021, a true and correct copy of the foregoing **Joint Stipulation to**  
4 **Modify Briefing Schedule** was served via electronic means by operation of the Court's electronic filing  
5 system, upon each party in this case who is registered as an electronic case filing user with the Clerk:

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27 /s/ Jamie Stafford  
28 An Employee of CHASNOFF MUNGIA VALKENAAR  
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