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Attorneys for Defendants
*City of Henderson, Henderson Police Chief Patrick Moers,
Detective Mark Hosaka and Detective Chad Mitchell*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

VANESSA KELLEY,

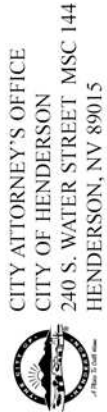
Plaintiff,

v.

CASE NO.: 2:15-CV-02204-APG-VCF

**STIPULATION AND ORDER TO
EXTEND TIME FOR DEFENDANTS TO
REPLY TO PLAINTIFF'S OPPOSITION
TO THE HENDERSON DEFENDANTS'
MOTION TO DISMISS (Second Request)**

CITY OF HENDERSON, a political
subdivision of the State of Nevada and the
County of Clark; LAS VEGAS
METROPOLITAN POLICE DEPARTMENT,
a political subdivision of the State of Nevada
and the County of Clark d/b/a/ CLARK
COUNTY DETENTION CENTER;
HENDERSON POLICE CHIEF PATRICK
MOERS, in his individual capacity; LVMPD
SHERIFF DOUGLAS GILLESPIE, in his
individual capacity; DETECTIVE MARK
HOSAKA, in his individual capacity as an
officer employed by the City of Henderson;
DETECTIVE CHAD MITCHELL, in his
individual capacity as an officer employed by
the City of Henderson; NAPHCARE, medical
care provider for the Clark County Detention
Center; CORIZON CORRECTIONAL
HEALTHCARE, a medical care provider for
the Henderson Jail; DOE DEFENDANTS I-



1 X, individually; DOES HENDERSON
2 POLICE OFFICERS I-X, individually as
3 officers employed by the City of Henderson;
4 DOE LVMPD POLICE OFFICERS I-X,
individually as officers employed by LVMPD;
and ROE ENTITIES I-X, inclusive,

5 Defendants.

6
7 **STIPULATION AND ORDER TO EXTEND TIME FOR DEFENDANTS TO REPLY TO**
8 **PLAINTIFF'S OPPOSITION TO THE HENDERSON DEFENDANTS'**
9 **MOTION TO DISMISS (Second Request)**

10 COME NOW Plaintiff Vanessa Kelley and Defendants City of Henderson,
11 Henderson Police Chief Patrick Moers, Detective Mark Hosaka and Detective Chad
12 Mitchell (collectively referred to as "Henderson Defendants"), by and through their
13 respective counsel of record, pursuant to LR 6-1, and hereby stipulate, agree and make
14 joint application to extend the time for the Henderson Defendants to file their Reply(ies) to
15 Plaintiff's Opposition (Doc. 31) to the Henderson Defendants' Motion to Dismiss (Doc. 17).
16 The time to file such Reply(ies) to the Plaintiff's Opposition to the Motion to Dismiss (Doc.
17 17) are currently due on Thursday, February 11, 2016 pursuant to the Stipulation and
Order entered on the First Request for Extension. (Doc. 36)

18 The stipulating parties respectfully request a seven (7) day extension up to and
19 including Thursday, February 18, 2016, for the Henderson Defendants' above-referenced
20 to file their Reply(ies).

21 The stipulating parties submit that good cause exists for this extension. Counsel
22 inadvertently included Thursday February 11, as the due date in the First Request, instead
23 of Thursday, February 18, 2016 based upon the Henderson Defendants' counsel's
24 schedule between the date of filing of the Plaintiff's Opposition to the Motion to Dismiss
25 (Doc. 31) and the requested date. As a result an extension up to and including February
26 18, 2016 is sought in this request in order to provide for adequate time for counsel to be
27 able to reasonably prepare a complete an appropriately supported Reply(ies) on behalf of
28 the Henderson Defendants and each of them.

1 Based upon the foregoing, the parties respectfully request that this Court enter its
2 order extending the time for the Henderson Defendants to file their Reply(ies) to Plaintiff's
3 Opposition to the Henderson Defendants' Motion to Dismiss (Doc. 31), up to and including
4 Thursday, February 18, 2016.

5 This is the second request for enlargement of time for the Henderson Defendants to
6 file their Reply(ies) to Plaintiff's Opposition to the Motion to Dismiss and it is made in good
7 faith and not for the purposes of delay.

8
9 POTTER LAW OFFICES

CITY OF HENDERSON
JOSH M. REID, City Attorney

10
11 /s/ Cal J. Potter

/s/ Nancy D. Savage

12 CAL J. POTTER, III, ESQ.
13 Nevada Bar No. 1988
14 CAL J. POTTER, IV, ESQ.
15 Nevada Bar No. 13225
16 1125 Shadow Lane
17 Las Vegas, Nevada 89102
18 Attorneys for Plaintiff

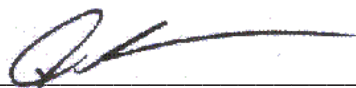
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Henderson, Nevada 89009
Attorney for Henderson Defendants

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21 DATED: February 8, 2016

DATED: February 8, 2016

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24 **ORDER**

25 IT IS SO ORDERED this 9th day of February, 2016.

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UNITED STATES DISTRICT JUDGE

