

1 ROBERT W. FREEMAN
 Nevada Bar No. 3062
 2 Email: robert.freeman@lewisbrisbois.com
 PAMELA L. MCGAHA
 3 Nevada Bar No. 8181
 Email: pamelamcgaha@lewisbrisbois.com
 4 **LEWIS BRISBOIS BISGAARD & SMITH LLP**
 6385 S. Rainbow Boulevard, Suite 600
 5 Las Vegas, Nevada 89118
 702.893.3383
 6 FAX: 702.893.3789
 Attorneys for Defendants
 7 City of North Las Vegas,
 Officer Scott Vaughn, Officer Aniya Slocum
 8 and Sergeant Kimko Moore

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 JUDY DONATELL, individually; JUDY
 DONATELL, as Special Administrator of the
 12 Estate of ANGELA DAWN DONATELL,
 deceased; JUDY DONATELL, as the
 13 Guardian Ad Litem for Xzavier Mendez, a
 minor, under 14 years of age,

14 Plaintiff,

15 vs.

16 THE CITY OF LAS VEGAS, a political
 17 subdivision of the State of Nevada; THE CITY
 OF NORTH LAS VEGAS; CORRECT CARE
 18 SOLUTIONS, a Tennessee Corporation;
 MICHELLE FREEMAN, Chief of Detention
 19 Enforcement for the City of Las Vegas,
 individually; LIEUTENANT RUSSELL,
 20 individually; SERGEANT AVILA,
 individually; SERGEANT MOORE,
 21 individually; SERGEANT B. BYARD,
 individually; SERGEANT M. BUNNELL
 22 #690 individually; OFFICER SCOTT
 VAUGHN #1280, individually; OFFICER A.
 23 SLOCUM, individually; OFFICER R.
 DORADO #889, individually; OFFICER
 24 AMANDA CHALMERS, individually;
 OFFICER TRACEY VALENZUELA,
 25 individually; OFFICER A. KNIGHT #835,
 individually; OFFICER JONATHAN
 26 MCCORMICK #883, individually; OFFICER
 ALGIN BROOKS #656, individually;
 27 OFFICER RAMON BROOKINS #959,
 individually; OFFICER YANNIS GIRON

CASE NO.: 2:15-cv-02334-RFB-NJK

**DEFENDANTS CITY OF NORTH LAS
 VEGAS, OFFICER SCOTT VAUGHN,
 AND OFFICER ANIYA SLOCUM'S
 STIPULATION AND ORDER FOR
 EXTENSION OF TIME TO FILE A
 RESPONSE TO PLAINTIFFS'
 COMPLAINT**

1 #1079, individually; OFFICER LANDROVE
#837, individually; OFFICER BLEDSOE
2 #963, individually; OFFICER RANDALL
#589, individually, NURSE ARTURO BUEN,
3 individually; NURSE ANNE BUEN,
individually; CCS PSYCHIATRIC NURSE
4 DENNIS MILES, individually; NURSE AMY
PEREZ, individually, NURSE DENNIS
5 CENDANA, individually; NURSE VICKIE
ATHUKORALA, individually; NURSE JANE
6 BALAO, individually; NURSE MARY
BOYD, individually; NURSE MARCIA
7 SENCIO; individually; PSYCHOLOGIST
DEAN NELSON, individually; NURSE
8 NORMA ALICIA-CARPIO, individually;
NURSE KELLY EVANS, individually;
9 NURSE SIEVE MAUA, individually; NURSE
LORETTA BURTON, individually; and DOE
10 DEFENDANTS I-X; and ROES I-X,
inclusive,

11 Defendants.

12
13 **DEFENDANTS CITY OF NORTH LAS VEGAS, OFFICER SCOTT VAUGHN, AND**
14 **OFFICER ANIYA SLOCUM'S STIPULATION AND ORDER FOR EXTENSION**
OF TIME TO FILE A RESPONSE TO PLAINTIFFS' COMPLAINT

15 COME NOW, the parties, by and through their undersigned counsel of record and hereby
16 stipulate and agree that the time for Defendants City of North Las Vegas, Officer Scott Vaughn
17 and Officer Aniya Slocum to file their response to Plaintiffs' Complaint, said response being due
18 on February 11, 2016 be extended until March 18, 2016.

19 **Reason for Extension**

20 Because of the complexity of the claims made in Plaintiffs' Complaint, Defendants City of
21 North Las Vegas, Officer Scott Vaughn and Officer Aniya Slocum need additional time to
22 perform an investigation prior to filing a responsive pleading. This stipulation is made in good
23 faith and not for the purpose of delay. This is the second extension of time requested by counsel

24 ...
25 ...
26 ...
27 ...

1 for filing Defendant City of North Las Vegas' response to Plaintiffs' Complaint and the first
2 extension for Defendant Officers Scott Vaughn and Aniya Slocum .

3 Dated this 11th day of February, 2016. Dated this 11th day of February, 2016.

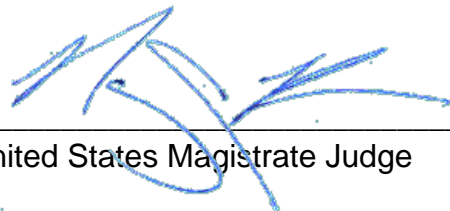
4 LEWIS BRISBOIS BISGAARD & SMITH LLP POTTER LAW OFFICES

5
6 /s/ Robert W. Freeman /s/ Cal J. Potter, III, Esq.
7 Robert W. Freeman, Esq. Cal J. Potter, III, Esq.
8 Nevada Bar No. 3062 Nevada Bar No. 1988
9 Pamela L. McGaha, Esq. C.J. Potter, IV, Esq.
10 Nevada Bar No. 8181 Nevada Bar No. 13225
11 6385 S. Rainbow Blvd., Suite 600 1125 Shadow Lane
12 Las Vegas, Nevada 89118 Las Vegas, Nevada 89102
13 *Attorney for Defendant* *Attorneys for Plaintiffs*
14 *City of North Las Vegas*

11
12 **ORDER**

13 IT IS SO ORDERED.

14 Dated: February 12, 2016

15
16 
17 _____
18 United States Magistrate Judge