

1 ADAM PAUL LAXALT
Attorney General
2 JARED M. FROST (Bar No. 11132)
Senior Deputy Attorney General
3 State of Nevada
Office of the Attorney General
4 555 East Washington Avenue
Suite 3900
5 Las Vegas, Nevada 89101
(702) 486-3177 (phone)
6 (702) 486-3773 (fax)
Email: jfrost@ag.nv.gov

7
8 *Attorneys for Defendants Eduardo Serna
and Cornelius Finley*

9
10
11
12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 MICHAEL SAMPLE,

15 Plaintiff,

16 v.

17 FINLEY, *et al.*,

18 Defendants.

Case No. 2:16-cv-00102-JAD-GWF

**DEFENDANTS' MOTION TO
EXTEND THE STAY FOR
SETTLEMENT PURPOSES**

(First Request)

19
20 Defendants Eduardo Serna and Cornelius Finley, by and through counsel, Adam
21 Paul Laxalt, Nevada Attorney General, and Jared M. Frost, Senior Deputy Attorney
22 General, of the State of Nevada, Office of the Attorney General, hereby moves this Court
23 to extend the stay for an additional thirty (30) days for settlement purposes.

24 On June 20, 2016, the Court issued an order staying the case for ninety (90) days
25 so that the parties could participate in an early mediation conference. ECF No. 3. The
26 stay is currently set to expire on September 20, 2016.

27 On September 16, 2016, the parties reached an agreement to fully resolve this
28 matter. *See* ECF No. 7 (minutes of proceedings). However, the parties need additional

1 time to execute a binding settlement agreement and to file a stipulation to dismiss the
2 case so that Plaintiff is not prematurely charged the filing fee. Therefore, Defendants
3 request that the stay be extended for an additional thirty (30) days.

4 DATED this 20th day of September, 2016.

5 ADAM PAUL LAXALT
6 Attorney General

7 By: /s/ Jared M. Frost
8 JARED M. FROST (Bar No. 11132)
9 Senior Deputy Attorney General

10 *Attorneys for Defendants*

11
12
13 IT IS SO ORDERED.

14
15 DATED September 21, 2016.

16
17
18 
19 _____
20 UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I certify that I am an employee of the State of Nevada, Office of the Attorney General, and that on September 20, 2016, I electronically filed the foregoing document via this Court's electronic filing system. Parties that are registered with this Court's electronic filing system will be served electronically. For those parties not registered, service was made by depositing a copy for mailing in the United States Mail, first-class postage prepaid, at Las Vegas, Nevada to the following:

Michael Sample, NDOC #51854
Southern Desert Correctional Center
P.O. Box 208
Indian Springs, Nevada 89070
Plaintiff, Pro Se

/s/ Carol A. Knight
CAROL A. KNIGHT, an employee of
the Office of the Nevada Attorney General