

1 LAW OFFICE OF MITCHELL STIPP
 2 MITCHELL STIPP, ESQ.
 3 Nevada Bar No. 7531
 4 10161 Park Run Drive
 5 Suite 150
 6 Las Vegas, Nevada 89145
 7 Telephone: 725.999.2008
 8 Facsimile: 866.220.5332
 9 mstipp@stiplaw.com
 10 *Counsel for Plaintiffs*

11 **UNITED STATES DISTRICT COURT**
 12 **DISTRICT OF NEVADA**

<p>9 AMY STIPP, an individual, and as the mother 10 of MITCHELL STIPP, JR., a minor child, 11 12 Plaintiffs, 13 14 <i>vs.</i> 15 DR. JULIE F. BEASLEY, an individual, and 16 JULIE F. BEASLEY, PH.D., INC., a Nevada 17 corporation, 18 19 Defendants.</p>	<p>Case No. 2:16-CV-00395</p> <p><u>STIPULATION TO EXTEND DEADLINE FOR FILING OF DISCOVERY PLAN</u></p> <p>(First Request)</p>
--	---

20 Plaintiff, Amy Stipp, an individual, and as mother of Mitchell Stipp, Jr., her minor child
 21 (“Plaintiff”), by and through their attorney, Mitchell D. Stipp, Esq., of the LAW OFFICE OF
 22 MITCHELL STIPP, and Dr. Julie F. Beasley, an individual, and Julie F. Beasley, Ph.D., Inc., a
 23 Nevada corporation (“Defendant”), by and through their attorney, Kathryn L. Butler, Esq., of
 24 LEWIS BRISBOIS BISGAARD & SMITH LLP, agree and stipulate as follows:

- 25 1. Defendant filed a Motion to Dismiss on March 28, 2016 (Dkt. No. 5).
- 26 2. Plaintiff filed an Opposition to Defendant’s Motion to Dismiss on April 14, 2016
 27 (Dkt. No. 6).

1 3. Defendant filed a Reply to Plaintiff's Opposition to Motion to Dismiss on April
2 25, 2016 (Dkt. No. 8).

3 4. Plaintiff filed a Motion to Strike Defendant's Reply to Opposition to Motion to
4 Dismiss on April 26, 2016 (Dkt. No. 9). Defendants' Opposition to Plaintiff's Motion to Strike
5 is due on or before May 13, 2016.

6 5. The court filed a Transfer Order on April 27, 2016 (Dkt. No. 10). This order
7 transferred case entitled, "Amy Stipp v. Cole et al.," Case No. 2:16-cv-00396 ("Stipp v. Cole"),
8 to Judge Gloria Navarro ("Judge Navarro") from Judge Jennifer Dorsey.

9 6. Judge Navarro filed a Minute Order on April 28, 2016 requesting briefing by
10 parties to show cause as to why this case should not be consolidated with Stipp v. Cole. The
11 briefing on the issue of consolidation is due on or before May 19, 2016.

12 7. The Discovery Plan in this case is due on May 12, 2016.

13 8. The parties desire to have the motion to dismiss and issue of consolidation
14 resolved before filing a Discovery Plan. Therefore, the parties agree to extend the time for the
15 filing of a Discovery Plan to a new date as determined by the court.

16 Dated this 12th day of May, 2016

17 LAW OFFICE OF MITCHELL STIPP

18 LEWIS BRISBOIS BISGAARD & SMITH LLP

19 */s/ Mitchell Stipp*

20 */s/ Kathryn L. Butler*

21 _____
22 Mitchell Stipp, Esq.
23 Nevada Bar No. 7531
24 10161 Park Run Drive, Suite 150
25 Las Vegas, Nevada 89145
26 *Counsel for Plaintiffs*

27 _____
28 S. Brent Vogel, Esq.
Nevada Bar No. 6858
Kathryn L. Butler, Esq.
Nevada Bar No. 9464
6385 S. Rainbow Blvd., Suite 600
Las Vegas, Nevada 89118
Counsel for Defendants

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

Based upon the Stipulation of the parties, and good cause appearing therefor, the deadline for the parties to file a discovery plan in this matter shall be extended to the 16th day of August, 2016.

IT IS SO ORDERED this 13th day of May, 2016.



U.S. MAGISTRATE JUDGE