

1 DAN M. WINDER, ESQ.
 Nevada State Bar No. 1569
 2 KRISTINA MILETOVIC, ESQ.
 Nevada State Bar No. 14089
 3 LAW OFFICE OF DAN M. WINDER, P.C.
 3507 W. Charleston Blvd.
 4 Las Vegas, NV 89102
 Telephone: (702) 878-6000
 5 Facsimile: (702) 474-0631
 winderdanatty@aol.com
 6 Attorneys for Plaintiff

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

14 JOHN LIGE, an individual,
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 16 Plaintiff,
 17 vs.
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 19 CLARK COUNTY, a political subdivision of
 the State of Nevada; DOES I-V; and ROES
 20 VI-X,
 21 Defendants.

Case No: 2:16-cv-00603-JAD-(PAL)

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 23 **STIPULATION AND ORDER**
TO
EXTEND DEADLINE
TO
FILE JOINT PRETRIAL ORDER
[FIRST REQUEST]

24 Plaintiff John Lige, by and through his attorney of record, Dan M. Winder, Esq. of the
 25 Law Office of Dan M. Winder, P.C., and Defendant Clark County, by and through its attorney of
 record, Danielle C. Miller, Esq. of Lewis Brisbois Biggaard & Smith, hereby stipulate and agree:

- 26 1. The Joint-Pretrial Order in this matter is to be filed by up to and including Monday,
 27 Monday, April 23, 2018.

1 The reasons for this request are the following:

- 2 1. This matter has been referred to a mandatory settlement conference, scheduled for
3 April 11, 2018 (ECF No. 120). As this matter concerns thousands of pages of
4 evidence (including 10 deposition transcripts), even the Confidential Settlement
5 Brief, due April 4, 2018, will require several days for preparation.
- 6 2. Plaintiff hopes to make the most of the mandatory settlement conference in regards to
7 both discussion of settlement and preparation for trial.
- 8 3. This Honorable Court allowed five claims for relief to proceed to trial (ECF No. 119).
9 Prior to the March 20, 2018 deadline, Plaintiff and his counsel are still analyzing the
10 Order Granting In Part Defendant Clark County's Motion for Summary Judgment to
11 determine whether moving to reconsider any part is necessary.
- 12 4. In the last week or so and in the next three weeks, Plaintiff's counsel has been and
13 will be working to meet the at least following inordinate amount of deadlines:
- 14 a. Opening Brief, Judicial Review, Hicks v. Clark County Dept. of Family
15 Services, filed 03/05/18, Eighth Judicial District Court, Case No. A-17-
16 759909-J;
 - 17 b. Motion for Leave to File Second Amended Complaint, Muwwakkil v. CCSD,
18 filed 03/12/18, Eighth Judicial District Court, Case No. A-17-755222-C;
 - 19 c. Retention of expert and coordination of expert report, initial disclosure
20 deadline 4/02/18, Muwwakkil v. CCSD, Eighth Judicial District Court, Case
21 No. A-17-755222-C;
 - 22 d. Retention of expert and coordination of expert report, initial disclosure
23 deadline 3/29/18, jury trial date 09/10/18, Thorpe v. Mumpower, et. al., Eighth
24 Judicial District Court, Case No. A-15-714465-C;
 - 25 e. Confidential ENE Brief, Guo v. Bottega Veneta, Inc., due 3/29/18, Federal
26 District Court of Nevada, Case No. 2:17-cv-2778-MMD-(PAL);
 - 27 f. Preparation of timely outgoing discovery (Interrogatories, Requests for
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1 Production, and Request for Admissions) in Santi v. McClure, et al., Eighth
2 Judicial District Court, Case No. A-17-756848-C and Muwwakkil v. CCSD,
3 Eighth Judicial District Court, Case No. A-17-755222-C.

- 4 5. Between now and the current deadline to file the Joint Pretrial Order, March 22,
5 2018, Plaintiff's counsel is not available to personally prepare the Joint Pretrial Order
6 with Defendant's counsel on March 16, 2018. Plaintiff anticipates the meeting would
7 take at least five hours.
- 8 6. Counsel for Defendant has also been working and the following matters, which have
9 and will inhibit the ability to assist in the preparation of the Joint Pretrial Order:
- 10 a. Early Neutral Evaluation Statement, Grive v. Clark County, Election
11 Department, U.S. District Court, Case No. 2:17-cv-03109-JAD-VCF;
 - 12 b. Trial Preparation, Mankel v. GEICO, U.S. District Court, Case No. 3:16-cv-
13 00657-HDM-VPC; and
 - 14 c. Discovery in 600 Member Class Action Lawsuit, Small et al v. University
15 Medical Center of Southern Nevada, U.S. District Court, 2:13-cv-00298-
16 APG-PAL.
- 17 7. With the newly proposed April 23, 2018 Joint Pretrial Order deadline, this Honorable
18 Court would have approximately 330 days in which to set the case for trial within 3
19 years of the March 17, 2016 date of the filing of the complaint in the instant matter.
- 20 8. Due to the complex nature of this case and the time constraints discussed above, the
21 parties seek a one month extension in which to file their Joint Pretrial Order.
- 22 9. This stipulation is entered into in good faith and not to cause undue delay.
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1 DATED this 15th day of March, 2018.

DATED this 15th day of March, 2018.

2 Law Office of Dan M. Winder, P.C.

Lewis Brisbois Bisgaard & Smith LLP

3 /s/ Kristina Miletovic
4 DAN M. WINDER, ESQ.
Nevada State Bar No. 1569
5 KRISTINA MILETOVIC, ESQ.
Nevada State Bar No. 14089
6 3507 W. Charleston Blvd.
Las Vegas, NV 89102
7 Attorneys for Plaintiff

/s/ Danielle C. Miller
ROBERT W. FREEMAN, ESQ.
Nevada State Bar No. 3062
DANIELLE C. MILLER, ESQ.
Nevada State Bar No. 9127
6385 S. Rainbow Blvd., Suite 600
Las Vegas, Nevada 89118
Attorneys for Defendant Clark County

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10 **ORDER**

11 **IT IS HEREBY ORDERED** the Joint-Pretrial Order in this matter is to be filed by up to
12 and including Monday, April 23, 2018.

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14 **IT IS SO ORDERED** this 20th day of March, 2018.

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16 UNITED STATES MAGISTRATE JUDGE

1 **CERTIFICATE OF SERVICE**

2 Pursuant to LR 5-1, I hereby certify that I am an employee of the LAW OFFICE OF
3 DAN M. WINDER, P.C., and that on the 15th day of March, 2018, I served the foregoing
4 **STIPULATION AND ORDER TO EXTEND DEADLINE TO FILE JOINT PRETRIAL**
5 **ORDER [FIRST REQUEST]** on counsel as follows:

6
7 E-Service pursuant to LR 5-4:

8
9 Robert W. Freeman, Esq.
Nevada State Bar No. 3062
Danielle C. Miller, Esq.
Nevada State Bar No. 9127
10 LEWIS BRISBOIS BISGAARD & SMITH LLP
6385 S. Rainbow Blvd., Suite 600
Las Vegas, Nevada 89118
11 Tel: (702) 893-3383; Fax: (702) 893-3789
Robert.Freeman@lewisbrisbois.com
12 Danielle.Miller@lewisbrisbois.com
13 Attorneys for Defendant Clark County
14

15 /s/ Kristina Miletovic

16 Employee of the Law Office of Dan M. Winder P.C.
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