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8 **UNITED STATES DISTRICT COURT**
 9 **DISTRICT OF NEVADA**

11 JOHN LIGE, an individual,

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

12 Plaintiff,

13 vs.

**STIPULATION AND ORDER TO
 EXTEND TIME TO RESPOND TO
 DEFENDANT CLARK COUNTY’S
 MOTION TO DISMISS (Dkt. #39),
 DEFENDANT SEIU’S JOINDER
 (Dkt. #42), DEFENDANT SEIU’S
 MOTIONS TO DISMISS (Dkt. #43 & #44),
 AND DEFENDANT CLARK COUNTY’S
 JOINDERS (Dkt. #47 & #48)**

14 CLARK COUNTY, a political subdivision of
 15 the State of Nevada, SERVICE EMPLOYEES
 16 INTERNATIONAL UNION, Local 1107,
 labor union; DOES I-V; and ROES VI-X,

17 Defendants.

[FIRST REQUEST]

21 Plaintiff John Lige, by and through his counsel of record, The Law Office of Dan M.
 22 Winder, P.C., Defendant Service Employees International Union, Local 1107 (“SEIU”), by and
 23 through its counsel of record, The Urban Law Firm, and Defendant Clark County, by and
 24 through its counsel of record, Lewis Brisbois Bisgaard & Smith LLP, hereby stipulate and agree
 25 that Plaintiff be allowed up to and including July 21, 2016 to file his response to:

- 26 1. Defendant CLARK COUNTY’s Motion to Dismiss (Dkt. #39), filed June 27, 2016,
 27 and Defendant SEIU’s Joinder to the Motion to Dismiss (Dkt. #42), filed July 1, 2016

1 2. Defendant SEIU's Motion to Dismiss (Dkt. #43), filed July 1, 2016, and Defendant
2 CLARK COUNTY's Joinder (Dkt. 47), filed July 5, 2016.

3 3. Defendant SEIU's Motion to Dismiss (Dkt. #44), filed July 1, 2016, and Defendant
4 CLARK COUNTY's Joinder (Dkt. 48), filed July 5, 2016.

5 Plaintiff requests the instant extension because he needs additional time to properly
6 respond to the numerous complex issues raised, because Plaintiff's counsel has an uncommonly
7 large amount of deadlines concentrated during this time period, and because Mr. Winder has
8 been out of state tending to a criminal matter. This is Plaintiff's first requested extension of this
9 deadline and is made in good faith and not for purposes of delay.

10 Dated this 14th day of July, 2016.

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

Lewis Brisbois Bisgaard & Smith LLP

12 /s/ Arnold Weinstock
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The Urban Law Firm

18 /s/ Sean W. McDonald
19 MICHAEL A. URBAN, Esq.
20 Nevada State Bar No. 3875
21 SEAN W. MCDONALD, Esq.
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24 Las Vegas, Nevada 89103
25 *Attorney for Defendant SEIU*

ORDER

26 IT IS SO ORDERED.

27 Dated: July 14, 2016.

28 
UNITED STATES DISTRICT JUDGE