

1 LYSSA S. ANDERSON  
 Nevada Bar No. 5781  
 2 RYAN W. DANIELS  
 Nevada Bar No. 13094  
 3 KAEMPFER CROWELL  
 1980 Festival Plaza Drive, Suite 650  
 Las Vegas, Nevada 89135  
 4 Telephone: (702) 792-7000  
 Fax: (702) 796-7181  
 5 [landerson@kcnvlaw.com](mailto:landerson@kcnvlaw.com)  
[radaniels@kcnvlaw.com](mailto:radaniels@kcnvlaw.com)  
 6 **Attorneys for Defendant**  
**Officer Boe D. Dennett**

7 UNITED STATES DISTRICT COURT  
 8 DISTRICT OF NEVADA

9 SAGAR NAVIN PATEL,

Case No. 2:16-cv-00730-JAD-PAL

10 Plaintiff,

11 vs.

**STIPULATION AND ORDER TO  
 EXTEND DISPOSITIVE MOTION  
 DEADLINE**

12 OFFICER BOE D. DENNETT, DOES I  
 through V, inclusive; and ROE  
 13 CORPORATIONS VI through X, inclusive,

**(First Request)**

14 Defendants.

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 16 The above-referenced parties, by and through their counsel of record, hereby agree and  
 17 stipulate to extend the Dispositive Motion deadline currently set for April 14, 2017, for an  
 18 additional fourteen (14) days, until April 28, 2017. This is the first requested extension between  
 19 the parties. The extension is being requested as Counsel for Defendant has been in a Trial for the  
 20 weeks of March 27, 2017 and April 3, 2017 in her capacity as General Counsel for the law firm  
 21 of Kaempfer Crowell in a State Court matter which the firm is a Defendant. As such,  
 22 Defendants' Counsel requires a brief extension of the deadline to prepare the dispositive motion.

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 Suite 650  
 Las Vegas, Nevada 89135

1           The parties recognize that this request is not being made within twenty-one (21) days of  
2 the current deadline to file dispositive motions, April 14, 2017 pursuant to LR 26-4; however the  
3 parties submit that the excusable neglect exists.

4           LR 26-4 states in relevant part:

5           A motion or stipulation to extend a deadline set forth in a discovery plan must be  
6 received by the court no later than 21 days before the expiration of the subject  
7 deadline. A request made within 21 days of the subject deadline must be  
8 supported by a showing of good cause. A request made after the expiration of the  
9 subject deadline will not be granted unless the movant also demonstrates that the  
10 failure to act was the result of excusable neglect.

11           In evaluating excusable neglect, the court considers the following factors: (1) the reason  
12 for the delay and whether it was in the reasonable control of the moving party, (2) whether the  
13 moving party acted in good faith, (3) the length of the delay and its potential impact on the  
14 proceedings, and (4) the danger of prejudice to the nonmoving party. *See Pioneer Inv. Servs. Co.*  
15 *v. Brunswick Assocs.*, 507 U.S. 380, 395 S. Ct. 1489, 123 L.Ed.2d 74 (1993).

16           Defendants' Counsel did not know twenty-one (21) days ago that the Trial she has been  
17 required to attend would be going forward. Indeed, she was not aware that the Trial was  
18 proceeding until the week prior March 27, 2017.

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1 The extension will not prejudice any party and will allow the parties to properly brief  
2 their dispositive motions for this Court. The parties are not delaying the conclusion of this  
3 matter by way of trial or otherwise; no trial date has yet been ordered.

4 IT IS SO STIPULATED this 3<sup>rd</sup> day of April, 2017.

5 **KAEMPFER CROWELL**

**LUCHERINI BLAKELY COURTNEY,  
P.C.**

7 By: /s/ Lyssa S. Anderson  
8 LYSSA S. ANDERSON  
9 Nevada Bar No. 5781  
RYAN DANIELS  
10 Nevada Bar No. 13094  
1980 Festival Plaza Drive, #650  
Attorneys for Defendant

By: /s/ John C. Courtney  
Christopher L. Blakesley, Esq.  
Nevada Bar No. 11922  
John C. Courtney, Esq.  
Nevada Bar No. 11092  
3175 S. Eastern Avenue  
Las Vegas, NV 89169  
Attorneys for Plaintiff

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12 **IT IS SO ORDERED.**

13 DATED this 26th day of April, 2017.

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UNITED STATES DISTRICT COURT JUDGE