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12 **Attorneys for Defendant**  
13 **Officer Boe D. Dennett**

14 UNITED STATES DISTRICT COURT

15 DISTRICT OF NEVADA

16 SAGAR NAVIN PATEL,  
17 Plaintiff,  
18 vs.  
19 OFFICER BOE D. DENNETT, DOES I  
20 through V, inclusive; and ROE  
21 CORPORATIONS VI through X, inclusive,  
22 Defendants.

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

24 **STIPULATION AND ORDER TO  
EXTEND DISPOSITIVE MOTION  
DEADLINE  
(First Request)**

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

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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**

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

7           By: /s/ Lyssa S. Anderson  
8           LYSSA S. ANDERSON  
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13           Attorneys for Defendant

7           By: /s/ John C. Courtney  
8           Christopher L. Blakesley, Esq.  
9           Nevada Bar No. 11922  
10           John C. Courtney, Esq.  
11           Nevada Bar No. 11092  
12           3175 S. Eastern Avenue  
13           Las Vegas, NV 89169  
14           Attorneys for Plaintiff

15           **IT IS SO ORDERED.**

16           DATED this 26th day of April, 2017.

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18           UNITED STATES DISTRICT COURT JUDGE