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4 *Attorney for Plaintiff Robert Jackson*

6 **UNITED STATES DISTRICT COURT**  
 7 **DISTRICT OF NEVADA**

8 ROBERT JACKSON  
 9 Plaintiff,  
 10 v.  
 11 STATE OF NEVADA, et al.,  
 12 Defendant(s).

Case No.: 2:16-CV-00995-APG-NJK

**STIPULATION TO EXTEND  
 DEADLINES IN STATUS REPORT  
 (ECF NO. 135)**

PISANELLI BICE  
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 LAS VEGAS, NEVADA 89101

15 Plaintiff Robert Jackson ("Mr. Jackson"), by and through his undersigned counsel, and  
 16 Defendants State of Nevada, et al., ("Defendants"), by and through their undersigned counsel,  
 17 hereby stipulate and agree to extend the time to confer in an attempt to resolve the outstanding  
 18 issues of fees and costs, as set forth in the Status Report filed February 27, 2023. (ECF No. 135.)

19 The parties have been negotiating regarding the attorneys' fee and cost award in good  
 20 faith, but have been unable to reach an agreement. The parties believe that additional time may  
 21 assist the parties in reaching an agreement without the assistance of the Court.

22 Accordingly, on or before June 12, 2023, if the parties cannot reach an agreement  
 23 regarding the outstanding issues of fees and costs, Plaintiff shall file a motion for fees and costs.  
 24 In addition, Defendants reserve the right to file their own motion for fees and costs and to file an  
 25 appropriate opposition to any motion Plaintiff may file. Alternatively, if the parties are able to  
 26 reach an agreement, on or before June 12, 2023, the parties shall submit a proposed form of final  
 27 judgment.

1 This is the first stipulation for an extension of time to confer regarding the outstanding  
2 issues of fees and costs. The Parties represent that this stipulation is sought in good faith, is not  
3 interposed for delay, and is not filed for an improper purpose. Accordingly, the deadline set forth  
4 in the Status Report shall be extended as follows:

5 Deadline for the parties to file a proposed form of final judgment or status report or for  
6 Plaintiff to file a motion for attorneys' fees and costs: June 12, 2023.

7 DATED this 27th day of April 2023

DATED this 27th day of April 2023

8 By: /s/ Emily A. Buchwald  
9 Emily A. Buchwald, Esq., Bar No. 13442  
10 PISANELLI BICE PLLC  
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By: /s/ D. Randall Gilmer  
D. Randall Gilmer, Esq., Bar No. 14001  
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Las Vegas, Nevada 89101

11 *Attorneys for Defendant Robert Jackson*

*Attorney for Defendants Jennifer Nash and  
Brian Williams*

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15 **IT IS SO ORDERED.**

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17 UNITED STATES DISTRICT JUDGE

18 DATED: May 1, 2023

19 CASE NO. 2:16-CV-00995-APG-NJK  
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