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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

**SECOND 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 and the Stipulation to Extend Deadlines in Status Report (ECF No. 138).

20 The parties have been negotiating regarding the attorneys' fee and cost award in good faith
 21 and believe that they have reached an agreement in principle to resolve the remaining claims in
 22 this matter. However, as Plaintiff is in the custody of NDOC, additional time is necessary for his
 23 counsel to discuss the settlement documents and to obtain his signature on the necessary
 24 documents. Accordingly, on or before July 10, 2023, the parties shall file a proposed form of
 25 judgment or a status report regarding the status of the settlement.

26 This is the second stipulation for an extension of time to confer regarding the outstanding
 27 issues of fees and costs. The Parties represent that this stipulation is sought in good faith, is not

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1 interposed for delay, and is not filed for an improper purpose. Accordingly, the deadline set forth
2 in the Status Report shall be extended as follows:

3 Deadline for the parties to file a proposed form of final judgment or status report or for
4 Plaintiff to file a motion for attorneys' fees and costs: July 10, 2023.

5 DATED this 9th day of June 2023.

DATED this 9th day of June 2023.

6 By: /s/ Emily A. Buchwald
7 Emily A. Buchwald, Esq., Bar No. 13442
8 PISANELLI BICE PLLC
400 South 7th Street, Suite 300
Las Vegas, Nevada 89101

By: /s/ D. Randall Gilmer
D. Randall Gilmer, Esq., Bar No. 14001
Leo T. Hedges, Esq., Bar No. 16034
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555 E. Washington Ave. Suite 3900
Las Vegas, Nevada 89101

9 *Attorneys for Defendant Robert Jackson*

*Attorney for Defendants Jennifer Nash and
Brian Williams*

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13 **IT IS SO ORDERED.**

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UNITED STATES DISTRICT JUDGE

16 DATED: June 12, 2023

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