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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

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

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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 Stipulation to Extend Deadlines in Status Report (ECF No. 138), the Second Stipulation to
20 Extend Deadlines in Status Report (ECF No. 141), and the Third Stipulation to Extend Deadlines
21 in Status Report (ECF No. 143).

22 The parties have been in communication related to the ongoing issue regarding the
23 attorneys' fee and cost award. The parties have also been discussing issues related to the
24 Stipulation and Order Regarding Injunction, entered July 28, 2020 (ECF No. 122), in particular
25 Southern Desert Correctional Center's implementation of a diet for Plaintiff that was in
26 compliance with the injunction. Additionally, the Nevada Department of Corrections recently
27 announced that it would be making changes to its menus, including the menu for Plaintiff.
28 Accordingly, the parties ask that the Court set an in-person status check for 6 months from the

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1 date of this Status Report, for the parties to provide the Court with an update regarding 1) the
2 attorneys' fee and cost award and 2) NDOC's updated menu and the implementation of the
3 injunction. Alternatively, on or before March 11, 2024, the parties shall file a proposed form of
4 judgment, a status report regarding the status of the settlement and injunction, or for a Plaintiff to
5 file a motion for attorneys' fees or costs.

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

10 Deadline for the parties to file a proposed form of final judgment, status report, or for
11 Plaintiff to file a motion for attorneys' fees and costs: March 11, 2024.

12 DATED this 8th day of September 2023.

DATED this 8th day of September 2023.

13 By: /s/ Emily A. Buchwald
14 Emily A. Buchwald, Esq., Bar No. 13442
15 PISANELLI BICE PLLC
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By: /s/ D. Randall Gilmer
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16 *Attorneys for Plaintiff Robert Jackson*

*Attorney for Defendants Jennifer Nash and
Brian Williams*

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE

DATED September 19, 2023

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

28