1 JAMES P. KEMP, ESQ. Nevada Bar No.: 006375 2 VICTORIA L. NEAL, ESQ. Nevada Bar No.: 13382 3 KEMP & KEMP, ATTORNEYS AT LAW 7435 W. Azure Drive, Suite 110, 4 Las Vegas, NV 89130 5 (702) 258-1183 tel./(702) 258-6983 fax jp@kemp-attorneys.com 6 vneal@kemp-attorneys.com 7 Attorneys for Plaintiff UNITED STATES DISTRICT COURT 8 DISTRICT OF NEVADA 9 * * * 10 JONAH AMSEL, JULIO RIVERA, AND Case No.: 2:16:-cv-00999-RFB-GWF 11 EDUARDO MALTMAN, STIPULATION, REQUEST AND ORDER 12 FOR EXTENSION OF TIME FOR Plaintiff. PLAINTIFFS AMSEL AND RIVERA TO vs. 13 **RESPOND TO DEFENDANT** GERRARD'S MOTION TO DISMISS OR 14 DOUGLAS D. GERRARD; DOLORES IN THE ALTERNATIVE MOTION FOR ELIADES; and, ARISTOTELIS ELIADES; 15 SUMMARY JUDGMENT AT ECF NO. 35 DOES I through X; and, ROES I through X, inclusive, 16 [FIRST REQUEST] Defendants. 17 18 Plaintiffs Amsel and Rivera and Defendant Gerrard, by and through their respective counsel 19 of record, stipulate and request that the Court extend the deadline for Plaintiffs Amsel and Rivera's 20 response to Defendant Gerrard's Motion to Dismiss or in the Alternative Motion for Summary 21 Judgment Regarding Claims of Jonah Amsel and Julio Rivera at ECF No. 35. This Request is being 22 brought in good faith and is not sought for any improper purpose or other purpose of delay. Because 23 24 this matter is in its infancy and no discovery has been conducted, Plaintiffs require the additional 25 time to adequately investigate and properly respond to the allegations, claims and legal theories 26 brought forth in Defendant Gerrard's Motion for Summary Judgment. 27 . . . 28

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Tel.

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1	WHEREFORE, the parties respectfully request that this Court extend the deadline for	
2	Plaintiffs Amsel and Rivera to respond to Defendant Gerrard's Motion at ECF No. 35, up to and	
3	including July 25, 2016.	
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5	Respectfully submitted this 14th day of July, 2016.	
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8	JAMES P. KEMP, ESQ.	/s/ Nathan R. Henderson DOUGLAS D. GERRARD, ESQ.
9	VICTORIA L. NEAL, ESQ. KEMP & KEMP. ATTORNEYS AT LAW	NATHAN R. HENDERSON, ESQ. GERRARD COX & LARSEN
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13	Attorneys for Plaintiffs	Attorneys for Defendant
14	Amsel, Rivera, and Maltman	Douglas D. Gerrard
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18	IT IS SO ORDERED.	
19	R	
20		RICHARD F. BOULWARE, II
21	,	United States District Judge Dated:July 19, 2016.
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1 2	CERTIFICATE OF SERVICE	
2	This is to certify on the date indicated below the within and foregoing document was served	
4	via the court's CM/ECF system to the following persons or parties:	
5		
6	All Parties Registered Through the CM/ECF system.	
7		
8	DATED this 14th day of July, 2016.	
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10	/s/ Victoria L. Neal	
11	VICTORIA L. NEAL, ESQ.	
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