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

9 PATRICIA A. SHUFELT,
10 Plaintiff,
11 vs.
12 JUST BRAKES CORPORATION,
13 Defendant.

Case No: 2:16-cv-01028-GMN-CWH

**[PROPOSED] STIPULATION AND
ORDER REQUESTING TIME TO
RESPOND TO DEFENDANT’S MOTION
TO DISMISS**

14 COMES NOW, Plaintiff PATRICIA A. SHUFELT (hereinafter “Shufelt”) and Defendant
15 JUST BRAKES CORPORATION (hereinafter “Just Brakes”) by and through their respective
16 attorneys of record, and do hereby stipulate and agree to extend the time for Plaintiff to respond
17 to Defendant’s Motion to Dismiss Plaintiff’s Complaint (ECF #11), and the time for Defendant’s
18 Reply to Plaintiff’s response.
19

20 Accordingly, Plaintiff shall have up to and including May 3, 2017, to respond to
21 Defendant’s Motion to Dismiss Plaintiff’s Complaint (ECF #4) and Defendant shall have up to
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1 including May 10, 2017, to file a Reply. The reason the extension is requested is the fact that
2 Plaintiff's counsel was just retained to represent Plaintiff on April 19, 2017.

3
4 Dated: April 20, 2017

Dated: April 20, 2017

5 **HATFIELD & ASSOCIATES, LTD.**

LITTLER MENDELSON, P.C.

6 /s/ Trevor J. Hatfield

/s/ Timothy W. Roehrs

7 By: _____

By: _____

8 Trevor J. Hatfield, Esq.

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Email: troehrs@littler.com

Attorneys for Defendant

15
16 **IT IS SO ORDERED.**

17 Dated this 21 day of April, 2017.

18
19 
20 _____/JUDGE

21 Respectfully submitted:

22
23 Dated April 20, 2017

24 **HATFIELD & ASSOCIATES, LTD.**

25 /s/ Trevor J. Hatfield

26 By: _____

27 Trevor J. Hatfield, Esq. (SBN 7373)

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(702) 388-4469 Tel.

Attorney for Plaintiff

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CERTIFICATE OF SERVICE

1
2 I certify that on the 20th day of April, 2017, I electronically filed the foregoing
3 STIPULATION AND ORDER REQUESTING TIME TO RESPOND TO DEFENDANT’S
4 MOTION TO DISMISS with the Clerk of the Court using the ECF system which served the
5 parties hereto electronically.
6

7 Dated this 20th day of April, 2017.

By /s/ Freda P. Brazier
An employee of Hatfield & Associates, Ltd.