

FISHER & PHILLIPS LLP
300 S Fourth Street, Suite 1500
Las Vegas, Nevada 89101

1 **FISHER & PHILLIPS LLP**
2 SCOTT M. MAHONEY, ESQ
3 Nevada Bar No. 1099
4 DAVID B. DORNAK, ESQ.
5 Nevada Bar No. 6274
6 ALLISON L. KHEEL, ESQ.
7 Nevada Bar No. 12986
8 300 S. Fourth Street
9 Suite 1500
10 Las Vegas, NV 89101
11 Telephone: (702) 252-3131
12 FAX: (702) 252-7411
13 ddornak@fisherphillips.com
14 *Attorneys for Defendants/
15 Third-Party Defendants*

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 THE BOARD OF TRUSTEES OF THE
13 CONSTRUCTION INDUSTRY AND
14 LABORERS HEALTH AND WELFARE
15 TRUST; THE BOARD OF TRUSTEES OF
16 THE CONSTRUCTION INDUSTRY AND
17 LABORERS JOINT PENSION TRUST; THE
18 BOARD OF TRUSTEES OF THE
19 CONSTRUCTION INDUSTRY AND
20 LABORERS VACATION TRUST; THE
21 BOARD OF TRUSTEES OF SOUTHERN
22 NEVADA LABORERS LOCAL 872
23 TRAINING TRUST,

20 Plaintiffs,

21 vs.

22 MOHAVE RESTORATION, INC. dba
23 SERVICE MASTERS 1st RESPONSE, a
24 foreign corporation; JEREMIAH L. COX, an
25 individual,

24 Defendants.

26 THE BOARD OF TRUSTEES OF THE
27 CONSTRUCTION INDUSTRY AND
28 LABORERS HEALTH AND WELFARE
TRUST; et al.

Plaintiffs,

Case No.: 2:16-cv-01190-JAD-CWH

**STIPULATION AND ORDER TO
EXTEND THE DEADLINE FOR
DEFENDANTS/THIRD-PARTY
DEFENDANTS TO FILE THEIR
OPPOSITION TO THIRD-PARTY
PLAINTIFF'S MOTION FOR
SUMMARY JUDGMENT (ECF
NO. 42)**

(FIRST REQUEST)

ECF No. 45

1 vs.

2
3 HANOVER INSURANCE COMPANY, a
4 New Hampshire insurance company; NORTH
5 AMERICAN SPECIALTY INSURANCE
6 COMPANY, a New Hampshire insurance
7 company; DOES 1 THROUGH 10, and ROE
8 CORPORATIONS 1 THROUGH 10,
9 inclusive,

10 Defendants.

11
12

HANOVER INSURANCE COMPANY, a
13 New Hampshire Insurance company;

14 Third Party Plaintiff,

15 vs.

16
17 MOHAVE RESTORATION, INC. dba
18 SERVICE MASTERS 1st RESPONSE, a
19 foreign corporation; JEREMIAH L. COX, an
20 individual,

21 Third Party Defendants.
22

23
24 IT IS HEREBY STIPULATED AND AGREED by the parties' counsel of
25 record that the Defendants/Third-Party Defendants will have an extension of time
26 up to and including **February 12, 2018** to file their Opposition to Third-Party
27 Plaintiff's Motion for Summary Judgment (ECF No. 42), currently due on
28 January 29, 2018. Counsel for Defendants/Third-Party Defendants has several
other filings due that day and request this extension of time based upon workload
and to allow sufficient time to prepare their Opposition.

This is the first request for an extension of this deadline. This request will
not prejudice any party or delay this proceeding given the previously granted
extension of the dispositive motion deadline to March 9, 2018. (ECF No. 41).

1 The foregoing constitutes good cause for the extension of the deadline.

2 Respectfully submitted this 25th day of January, 2018.

3 Dated: January 25, 2018

FISHER & PHILLIPS LLP

4 /s/ Allison L. Kheel, Esq.
5 DAVID B. DORNAK, ESQ.
6 Nevada State Bar No. 6274
7 ALLISON L. KHEEL, ESQ.
8 Nevada State Bar No. 12986
9 300 South Fourth Street, Suite 1500
10 Las Vegas, Nevada 89101
11 Attorneys for Defendants

12 Dated: January 25, 2018

THE URBAN LAW FIRM

13 /s/ Nathan R. Ring, Esq.
14 MICHAEL A. URBAN, ESQ.
15 Nevada State Bar No. 3875
16 NATHAN R. RING, ESQ.
17 Nevada State Bar No. 12078
18 4270 S. Decatur Blvd., Suite A-9
19 Las Vegas, Nevada 89103
20 Attorneys for Plaintiffs

21 Dated: January 25, 2018

JENNINGS STROUSS & SALOMON

22 /s/ Patrick F. Welch, Esq.
23 PATRICK F. WELCH, ESQ.
24 Nevada State Bar No. 13278
25 One East Washington Av., Ste. 1900
26 Phoenix, AZ 85004-2554
27 Attorneys for Third Party Plaintiff

28 **ORDER**

Based on the parties' stipulation [ECF No. 45] and good cause appearing, IT IS
HEREBY ORDERED that the **deadline to respond to the motion for summary
judgment** [ECF No. 42] is **extended to February 12, 2018**. But counsel is cautioned
that workload will not likely be considered to be good cause for a second extension of
time.

26 
27 _____
28 U.S. District Judge Jennifer Dorsey
January 25, 2018