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9
10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 BRYAN DRYDEN,
13 Plaintiff,

14 v.

15 STATE OF NEVADA, *et al.*,
16 Defendants.

Case No. 2:16-cv-01227-JAD-EJY

**STIPULATION AND ORDER TO
EXTEND PROPOSED JOINT
PRETRIAL ORDER DEADLINE
(THIRD REQUEST)**

17 Defendant Ted Nielson, by and through counsel, Aaron D. Ford, Nevada Attorney
18 General, and Lorin M. Taylor, Deputy Attorney General, and Victoria C. Corey, Deputy
19 Attorney General; and Plaintiff Bryan Dryden, by and through counsel Justin V. Alper
20 hereby submit their third stipulation and agreement to extend the deadline for dispositive
21 motions and respectfully request that the Court extend the deadline to file a proposed joint
22 pretrial order to November 17, 2023. The Parties are requesting the modification in good
23 faith and the request is supported by good cause.

24 LR 26-3 requires that the extension of any date set by the discovery plan, scheduling
25 order, or other order must—as well as satisfying the requirements of LR IA 6-1 to explain
26 the reasons an extension is needed—demonstrate good cause for the extension.

27 Good cause to extend the deadline to file a proposed joint pretrial order exists.
28 Deputy Attorney General Victoria C. Corey has recently been added to the case in

1 preparation to take over when Deputy Attorney General Lorin M. Taylor transfers
2 divisions in October of 2023. Additionally, Deputy Attorney General Lorin M. Taylor has
3 been severely sick over the past few weeks, and was unable to come in office and work for
4 over a week, and she is currently catching up on her deadlines. Lastly, Plaintiff's Counsel
5 Justin V. Alper requires additional time to prepare a potential exhibit list, as there has
6 been a total of six depositions in this case, an evidentiary hearing including nine witnesses,
7 and hundreds of medical and other institutional documents that Plaintiff's Counsel needs
8 more time to review. Plaintiff's Counsel and Defense Counsel have been working well
9 together and believe they can continue working together to attempt to streamline this trial
10 and potentially stipulate to evidence, facts, and potential witnesses.

11 Based on the foregoing, the Parties submit that good cause exists to grant the
12 requested extension and that the deadline to submit a proposed joint pretrial order be
13 moved to November 17, 2023.

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15 DATED this 7th day of September, 2023
16 and respectfully submitted by:
17 AARON D. FORD
Attorney General

18 /s/ Victoria C. Corey
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DATED this 7th day of September, 2023
and approved as to form and content by:

18 /s/ Justin V. Alper
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Attorney for Plaintiff

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23 **IT IS SO ORDERED:**

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25
26 
27 _____
UNITED STATES DISTRICT JUDGE

28 Dated: 9-13-23