

OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.
WELLS FARGO TOWER
SUITE 1500, 3800 HOWARD HUGHES PARKWAY
LAS VEGAS, NV 89169
TELEPHONE: 702.369.6800

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ANTHONY L. MARTIN
Nevada Bar No. 08177
anthony.martin@ogletreedeakins.com
ERICA J. CHEE
Nevada Bar No. 12238
erica.chee@ogletreedeakins.com
OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.
Wells Fargo Tower
Suite 1500
3800 Howard Hughes Parkway
Las Vegas, NV 89169
Telephone: 702.369.6800
Fax: 702.369.6888

Attorneys for Defendant
Titanium Metals Corporation

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

DAVID COSPER, an individual,

Plaintiff,

vs.

TITANIUM METALS CORPORATION, a
Domestic Corporation; DOES 1 through X,
inclusive, ROE CORPORATIONS I through X,
inclusive,

Defendants.

Case No.: 2:16-cv-01548-JCM-CWH

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE AND
RESPOND TO DISPOSITIVE
MOTIONS

(SIXTH REQUEST)**

Defendant Titanium Metals Corporation (“Defendant”) and Plaintiff David Cosper (“Plaintiff”), by and through undersigned counsel, hereby stipulate and request that the dispositive motion deadline set forth in the current Stipulated and Order to Extend Discovery Deadlines (ECF No. 26) be extended by 2 weeks. The current deadline for dispositive motions is December 29, 2017. The parties respectfully request that the deadline for dispositive motions be moved to January 12, 2018, and any response date by extended by two weeks. All other deadlines set forth in ECF No. 26 will remain the same. This request is submitted pursuant to LR 6-1, 6-2, 7-1 and 26-4 and is the parties’ **first request** for an extension concerning only the dispositive motions, and the **sixth request** to extend deadlines pertaining to the parties scheduling order and discovery plan.

1 There is good cause for this requested extension as the parties just received a copy of
2 Plaintiff's continued deposition transcript on December 19, 2017. In addition, Defendant
3 requested the extension, and Plaintiff and his counsel agreed, due to the holiday schedules and last-
4 minute changes in travel for counsel and representatives from Defendant that necessitate additional
5 time to review and evaluate dispositive motions.

6 The parties stipulate and request that dispositive motions must now be filed on or before
7 Friday, **January 12, 2018**, and any response is to be filed on or before 35 days after service of the
8 summary judgment, and no later than Friday, **February 16, 2018**. For all the reasons stated above,
9 good cause exists to extend the dispositive motion deadline in this matter.

10 DATED this 27th day of December, 2017. DATED this 27th day of December, 2017.

11 HATFIELD & ASSOCIATES, LTD. OGLETREE, DEAKINS, NASH, SMOAK & STEWART,
12 P.C.

13 /s/ Trevor J. Hatfield
14 Trevor J. Hatfield
15 Nevada Bar No. 7373
16 703 South Eighth Street
17 Las Vegas, Nevada 89101
18 Attorneys for Plaintiff

13 /s/ Erica J. Chee
14 Anthony L. Martin
15 Nevada Bar No. 8177
16 Erica J. Chee
17 Nevada Bar No. 12238
18 Wells Fargo Tower
19 Suite 1500
20 3800 Howard Hughes Parkway
21 Las Vegas, NV 89169
22 Attorneys for Defendant

23 **ORDER**

24 IT IS SO ORDERED.

25 
26 _____
27 U.S. MAGISTRATE JUDGE

28 December 28, 2017

DATE