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 8 **UNITED STATES DISTRICT COURT**  
 9 **DISTRICT OF NEVADA**

10 DAVID COSPER, an individual,  
 11 Plaintiff,

12 vs.

13 TITANIUM METALS CORPORATION, a  
 Domestic Corporation; DOES I through X,  
 14 inclusive; ROE CORPORATIONS I through X,  
 15 inclusive,  
 16 Defendants.

CASE NO: 2:16-cv-01548-JCM-CWH

**STIPULATION AND  
 ORDER REQUESTING TIME TO  
 RESPOND TO DEFENDANT’S  
 MOTION FOR SUMMARY  
 JUDGMENT  
 (First Request)**

17 COMES NOW, Plaintiff, DAVID COSPER (hereinafter “Plaintiff”), by and through his  
 18 counsel, the law firm of Hatfield & Associates, Ltd., and Defendant TITANIUM METALS  
 19 CORPORATION (hereinafter “Defendant”), by and through its counsel, OGLETREE, DEAKINS,  
 20 NASH, SMOAK & STEWART, P.C., and do hereby stipulate and agree to an extension of time for  
 21 Plaintiff to respond to Defendant’s Motion for Summary Judgment (ECF #30), that was filed on  
 22 January 22, 2018. Accordingly, Plaintiff shall have up to and including March 8, 2018 to respond  
 23 to Defendant’s Motion for Summary Judgment (ECF #30).  
 24

25 The reason that the extension is requested is because the parties have agreed to extend the  
 26 dispositive motion deadline. On December 28, 2017, the Court granted Defendant’s extension to  
 27 file dispositive motions, which confirmed that Plaintiff’s response would be due 35 days after  
 28 Defendant’s Motion for Summary Judgment was filed. (ECF #28.) On January 11, 2018,

1 Defendant filed a request asking that both parties have an additional ten (10) days to file dispositive  
2 motions and a reciprocal additional ten (10) days' time for any response. (ECF #29.) The Court  
3 has not issued an order on this stipulation, but Defendant filed its Motion for Summary Judgment  
4 on January 22, 2018 (ECF #30). Defendant agrees to Plaintiff having forty-five (45) days after  
5 January 22, 2018 to respond, which is March 8, 2018.  
6

7 This request is submitted pursuant to LR IA 6-1, 6-2 and LR II 7-1 and 26-4 and is the  
8 parties' first request for an extension concerning an extension of the time for Plaintiff to respond to  
9 dispositive motions deadline. Plaintiff's attorney is requesting this extension of the parties'  
10 agreement (ECF #29) and because he has significant conflicts in his work schedule including  
11 fourteen (14) depositions, three (3) hearings and two (2) settlement conferences scheduled through  
12 the last week of January through the first week of March 2018.  
13

14 Dated: February 7, 2018

Dated: February 7, 2018

15 HATFIELD & ASSOCIATES, LTD.

OGLETREE, DEAKINS, NASH, SMOAK &  
STEWART, P.C.

16 /s/ Trevor J. Hatfield

/s/ Erica J. Chee

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27 Attorneys for Defendant

28 **IT IS SO ORDERED.**

Dated February 9, 2018.

  
UNITED STATES DISTRICT JUDGE