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 5 Attorneys for Defendants
Sheriff Lombardo, Bonnie Polley;
 6 *Corrections Officer Robert Garvey; and*
the Las Vegas Metropolitan Police Department

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

10 DONELL BRYANT,
 11
 Plaintiff,

12 vs.

13 KITCHEN MANAGER JOHN DOE;
 14 BONNIE POLLEY; OFFICER GARVEY,
 BADGE NO. 9250; SHERIFF LOMBARDO;
 15 LAS VEGAS METROPOLITIAN POLICE
 DEPARTMENT, DETENTION SERVICES
 16 DIVISION, THE STATE OF NEVADA EX
 REL, ALL.

17 Defendants.
 18

CASE NO. 2:16-cv-1584-APG-VCF

**MOTION TO EXTEND DISPOSITIVE
 MOTIONS DEADLINE**

(FIRST REQUEST)

19 Defendants Sheriff Joseph Lombardo, Bonnie Polley, Corrections Officer Robert Garvey
 20 and the Las Vegas Metropolitan Police Department, by and through their attorneys, Robert W.
 21 Freeman, Esq., of LEWIS BRISBOIS BISGAARD & SMITH, respectfully request this Court to
 22 issue an Order extending the deadlines to file dispositive motions in this case.

23 **MEMORANDUM IN SUPPORT**

24 Pursuant to Local Rules (LR) 2604, LR6-1 and LR 26-1, Defendants, by and through their
 25 attorneys, Lewis Brisbois Bisgaard & Smith LLP, hereby moves that this Court to extend the
 26 deadline to file dispositive motions in the above-captioned case 30 days up to and including
 27 Thursday, June 7, 2018.

28 Local Rule (LR) 2604 provides that applications to extend any date set by the discovery

1 plan, scheduling order or other order must, in addition to satisfying the requirements of LR6-1, be
2 supported by showing of good cause for the extension.

3 LR26-1 also requires that an application for the extension of a deadline must be received
4 by the court no later than 21 days before extension of the subject deadline.

5 LR6-1 provides the “(a) request made after the expiration of the specified period shall not
6 be granted unless the moving party, attorney or other person demonstrates the failure to act as a
7 result of excusable neglect.”

8 In addition Defendants request that the pretrial motion deadline be extended for an
9 additional 30 days as outlined herein. In support of this Motion Defendants state as follows:

10 All discovery in this matter has been completed and discovery is closed.

11 This Request for an extension of time is not sought for any improper purpose or other
12 purpose of delay. This request for extension is based upon the following:

13 Counsel for Defendants has been preparing for trials both scheduled to commence on May
14 7, 2018 in *Kathryn Kingham vs. State Farm Mutual Automobile Insurance Company*, 2:15-cv-
15 01555-APG-GWF, and in *Austin Stephan vs. State Farm Mutual Automobile Insurance Company*,
16 CV16-01846. Both cases have recently scheduled, however, significant time was spent over the
17 past sixty days preparing for the trials. In addition counsel for defendants is preparing appellate
18 reply briefings in *City of North Las Vegas adv. Mitchell*, 17-16552 and *Weathers v. Clark County*
19 *Detention Center*, et al, 17-17074. Finally, counsel has been out of town attending to a family
20 matter.

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WHEREFORE, Defendants respectfully request that this Court extend the time for the parties to file their dispositive motions by thirty (30) days from the current deadline of May 8, 2018 up to and including June 7, 2018.

DATED this 26th day of April, 2018.

LEWIS BRISBOIS BISGAARD & SMITH LLP

/s/ Robert W. Freeman
Robert W. Freeman, Esq.
Nevada Bar No. 3062
6385 S. Rainbow Blvd, Suite 600
Las Vegas, Nevada 89118
Attorneys for Defendants

Dispositive Motions must be filed on or before June 7, 2018.
Joint Pretrial Order must be filed on or before July 9, 2018.
If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order.

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: 5-7-2018

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 26th day of April, 2018, I electronically filed the **MOTION TO EXTEND DISPOSITIVE MOTIONS DEADLINE** with the Clerk of the Court through the Case Management/Electronic Filing System.

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on the 26th day of April, 2018, I served a true and correct copy of the foregoing **MOTION TO EXTEND DISPOSITIVE MOTIONS DEADLINE** by depositing a copy of same in the United States Mail at Las Vegas, Nevada postage fully prepaid, addressed to:

Donell Gerod Bryant
67983
Southern Desert Correctional Center
P.O. Box 208
Indian Springs, Nevada 89070
Plaintiff in Proper Person

/s/ Kristen Freeman
Employee of LEWIS BRISBOIS
BISGAARD & SMITH LLP