| 1 | CHERYL A. GRAMES, ESQ. | | |
|----|--|---|--|
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| 4 | Telephone (702) 893-3383 | | |
| 5 | Fax (702) 893-3789 Attorney for Allied Van Lines, Inc. and | | |
| | Berger Transfer and Storage, Inc. | | |
| 6 | | | |
| 7 | UNITED STATES DISTRICT COURT | | |
| 8 | DISTRICT OF NEVADA | | |
| 9 | | | |
| | MEGHAN KONEGNE - LHOWARD | C N 216 CW 01655 ADG CDW | |
| 10 | MEGHAN KONECNE and HOWARD MISLE, individually and as husband and wife, | Case No. 2:16-CV-01655-APG-GFW | |
| 11 | District | REQUEST TO EXTEND BRIEFING SCHEDULE FOR PLAINTIFFS' | |
| 12 | Plaintiffs, | OBJECTIONS TO MAGISTRATE | |
| 13 | vs. | ORDER DENYING RENEWED MOTION | |
| 13 | ALLIED VAN LINES, INC., a foreign | TO REOPEN DISCOVERY (ECF NO. 68) | |
| 14 | corporation; BERGER TRANSFER & STORAGE, INC., a foreign corporation; and | (FIRST REQUEST) | |
| 15 | DOES I-V, ROES VI-X, | ORDER | |
| 16 | Defendants. | OND EX | |
| | Defendants. | | |
| 17 | | | |
| 18 | The above-referenced parties, by and through their undersigned counsel of record, hereby | | |
| 19 | agree and stipulate, subject to the Court's approval, to extend the deadline for DEFENDANT | | |
| 20 | ALLIED VAN LINES, INC. ("Defendant") to file its Response to Plaintiffs' Objection to | | |
| 21 | Magistrate Order Denying Renewed Motion to Reopen Discovery (ECF No. 68). The deadline for | | |
| 22 | the Response is currently set for December 6, 2017 . The parties have reached a tentative | | |
| 23 | settlement agreement, but require additional time to finalize the settlement documents. As such | | |
| 24 | extending the due date for Defendant's Response by two weeks (to December 20, 2017) should | | |
| 25 | afford the parties sufficient time to finalize th | ne agreement, thereby bringing this matter to a | |

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& SMITH LLP
ATTORNEYS AT LAW

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4844-1682-6968.1 2:16-CV-01655-APG-GFW

This is the parties' first request for an extended briefing deadline to respond to ECF No.

resolution and thus obviating the need for a response to ECF No. 68.

| 1 | The proposed extension is requested in good faith and will not prejudice any party. | |
|----|---|--|
| 2 | IT IS SO STIPULATED. | |
| 3 | DATED this 6 th day of December 2017. | DATED this 5 th day of December 2017. |
| 4 | FENNEMORE CRAIG, PC | LEWIS BRISBOIS BISGAARD & SMITH LLP |
| 5 | | |
| 6 | /s/ Brenoch R. Wirthlin Brenoch R. Wirthlin, Esq. | /s/ Cheryl A. Grames CHERYL A. GRAMES, ESQ. |
| 7 | Nevada Bar No. 10282 300 S. Fourth Street, Suite 1400 | Nevada Bar No. 12752 6385 S. Rainbow Boulevard, Suite 600 |
| 8 | Las Vegas, NV 89101 | Las Vegas, Nevada 89118 |
| 9 | Attorneys for Plaintiffs | Attorneys for Defendants |
| 10 | | |
| 11 | | |
| 12 | IT IS SO ORDERED. | |
| 13 | Dated: December 7, 2017. | |
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| 14 | | al |
| 15 | | UNITED STATES DISTRICT COURT JUDGE |
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