

1 CHERYL A. GRAMES, ESQ.
Nevada Bar No. 12752
2 Email: Cheryl.Grames@LewisBrisbois.com
LEWIS BRISBOIS BISGAARD & SMITH LLP
3 6385 S. Rainbow Boulevard, Suite 600
Las Vegas, Nevada 89118
4 Telephone (702) 893-3383
Fax (702) 893-3789
5 Attorney for Allied Van Lines, Inc. and
Berger Transfer and Storage, Inc.
6

7 UNITED STATES DISTRICT COURT
8 DISTRICT OF NEVADA
9

10 MEGHAN KONECNE and HOWARD
MISLE, individually and as husband and wife,

11 Plaintiffs,

12 vs.

13 ALLIED VAN LINES, INC., a foreign
14 corporation; BERGER TRANSFER &
STORAGE, INC., a foreign corporation; and
15 DOES I-V, ROES VI-X,

16 Defendants.
17

Case No. 2:16-CV-01655-APG-GFW

**REQUEST TO EXTEND DISPOSITIVE
MOTION DEADLINE**

(FIRST REQUEST)

18 The above-referenced parties, by and through their undersigned counsel of record, have
19 determined that their Request to Extend Dispositive Motion Deadline (First Request) (ECF No.
20 73, filed on Friday December 8, 2017) was erroneously directed to the Honorable United States
21 District Court Judge Andrew P. Gordon for signature instead of properly directed to the Honorable
22 United States Magistrate Court Judge George W. Foley. As such, the parties hereby re-file the
23 Request, with the signature line corrected to reflect the proper signatory for the Court:

24 The above-referenced parties, by and through their undersigned counsel of record, hereby
25 agree and stipulate, subject to the Court's approval, to extend the deadline for the parties to file
26 dispositive motions. The deadline for dispositive motions is currently set for **December 11, 2017**.
27 (ECF No. 67). The parties have reached a tentative settlement agreement, but require additional
28 time to finalize the settlement documents. As such, extending the due date for dispositive motions

1 by two weeks (to **December 26, 2017**) should afford the parties sufficient time to finalize the
2 agreement, thereby bringing this matter to a resolution and thus obviating the need for dispositive
3 motions.

4 This is the parties' first request to extend the deadline by which to file dispositive motions.

5 The proposed extension is requested in good faith and will not prejudice any party.

6 **IT IS SO STIPULATED.**

7 DATED this 12th day of December 2017.

DATED this 12th day of December 2017.

8 **FENNEMORE CRAIG, PC**

LEWIS BRISBOIS BISGAARD & SMITH LLP

9

/s/ Brenoch R. Wirthlin

/s/ Cheryl A. Grames

10 **BRENOCH R. WIRTHLIN, ESQ.**

CHERYL A. GRAMES, ESQ.

11 Nevada Bar No. 10282
300 S. Fourth Street, Suite 1400

Nevada Bar No. 12752
6385 S. Rainbow Boulevard, Suite 600

12 Las Vegas, NV 89101
Attorneys for Plaintiffs

Las Vegas, Nevada 89118
Attorneys for Defendants

13

14

15

IT IS SO ORDERED.

16

Dated this 13th day of December, 2017.

17

18

19


UNITED STATES MAGISTRATE JUDGE

20

21

22

23

24

25

26

27

28