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 Attorney for Allied Van Lines, Inc. and  
 6 Berger Transfer and Storage, Inc.

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 8 UNITED STATES DISTRICT COURT  
 9 DISTRICT OF NEVADA

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

12 Plaintiffs,

13 vs.

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

17 Defendants.

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

**REQUEST TO EXTEND DEADLINE FOR  
 DEFENDANT'S RESPONSE TO  
 PLAINTIFFS' MOTION FOR RELIEF  
 UNDER RULE 60(b) (ECF NO. 71)**

**(FIRST REQUEST)**

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 19 The above-referenced parties, by and through their undersigned counsel of record, hereby  
 20 agree and stipulate, subject to the Court's approval, to extend the deadline for Defendant Allied  
 21 Van Lines, Inc. ("Defendant") to respond to Plaintiffs Megan Konecne's and Howard Misle's  
 22 ("Plaintiffs") Motion for Relief under FRCP 60(b) (ECF No. 71, filed on December 6, 2017). The  
 23 deadline for responding was December 20, 2017, but the parties have continued to focus on  
 24 finalizing their tentative settlement agreement, and inadvertently neglected to file a stipulation to  
 25 extend this particular response deadline. As the parties have set forth in their other stipulations  
 26 (all approved by the Court), the parties still require additional time to finalize the settlement  
 27 documents due to the impact of the end-of-the-year holidays on the parties' schedules. As such,  
 28 extending the due date for Defendant's response to Plaintiffs' Motion for Rule 60(b) Relief (ECF

4839-4343-8425.1

2:16-CV-01655-APG-GFW

Request to Extend Deadline to Respond to ECF No. 71  
 (First Request)

1 No. 71) to **January 9, 2018** should afford the parties sufficient time to finalize the agreement,  
2 thereby bringing this matter to a resolution and thus obviating the need for filing any responses.

3 This is the parties' first request to extend the deadline by which Defendant may file a  
4 Response to Plaintiffs' Motion for Relief under Rule 60(b) (ECF No. 71).

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

6 **IT IS SO STIPULATED.**

7 DATED this 28<sup>th</sup> day of December 2017.

DATED this 28<sup>th</sup> day of December 2017.

8 **FENNEMORE CRAIG, PC**

**LEWIS BRISBOIS BISGAARD & SMITH LLP**

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10 /s/ Brenoch R. Wirthlin  
11 **BRENOCH R. WIRTHLIN, ESQ.**  
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Attorneys for Defendants

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**IT IS SO ORDERED.**

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Dated: January 2, 2018.

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UNITED STATES DISTRICT JUDGE

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