1 CHERYL A. GRAMES, ESQ. Nevada Bar No. 12752 Email: Cheryl.Grames@LewisBrisbois.com LEWIS BRISBOIS BISGAARD & SMITH LLP 6385 S. Rainbow Boulevard, Suite 600 Las Vegas, Nevada 89118 Telephone (702) 893-3383 Fax (702) 893-3789 Attorney for Allied Van Lines, Inc. and Berger Transfer and Storage, Inc. 6 UNITED STATES DISTRICT COURT 7 8 DISTRICT OF NEVADA 9 MEGHAN KONECNE and HOWARD MISLE, individually and as husband and wife, 11 Plaintiffs. 12 VS. 13 ALLIED VAN LINES, INC., a foreign corporation; BERGER TRANSFER & 14 STORAGE, INC., a foreign corporation; and DOES I-V, ROES VI-X, 15 Defendants. 16 17 18

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

REQUEST TO EXTEND BRIEFING SCHEDULE FOR PLAINTIFFS' **OBJECTIONS TO MAGISTRATE** ORDER DENYING RENEWED MOTION TO REOPEN DISCOVERY (ECF NO. 68)

(THIRD REQUEST)

ORDER

The above-referenced parties, by and through their undersigned counsel of record, hereby agree and stipulate, subject to the Court's approval, to extend the deadline for DEFENDANT ALLIED VAN LINES, INC. ("Defendant") to file its Response to Plaintiffs' Objection to Magistrate Order Denying Renewed Motion to Reopen Discovery (ECF No. 68). The deadline for the Response is currently set for **January 3, 2017**, however, the parties require an additional brief extension of this deadline to accommodate the need to finalize their settlement agreement. The parties anticipate that extending the due date for Defendant's Response by one week (to **January** 10, 2017) should afford the parties sufficient time to finalize the agreement, thereby bringing this matter to a resolution and thus obviating the need for a response to ECF No. 68.

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

Defendant's Response to Plaintiffs' Motion to Reopen Discovery

28

19

20

21

22

23

24

25

26

27

68.

2:16-CV-01655-APG-GFW

1	The proposed extension is requested	d in good faith and will not prejudice any party.
2	IT IS SO STIPULATED.	
3	DATED this <u>3rd</u> day of January 2018.	DATED this 3rd day of January 2018.
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 Attorneys for Plaintiffs	Las Vegas, Nevada 89118 Attorneys for Defendants
9		
10		
11	IT IS SO ORDERED.	
12	Dated: January 4, 2018.	
13	• •	
14		
15		UNITED STATES DISTRICT COURT JUDGE
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		

LEWIS BRISBOIS BISGAARD & SMITH LLP ATTORNEYS AT LAW

4851-6366-6010.1

Defendant's Response to Plaintiffs' Motion to Reopen Discovery