| 1  | DAYLE ELIESON<br>United States Attorney  |  |  |
|----|--|--|--|
| 2  | District of Nevada   |  |  |
| 3  | KRYSTAL J. ROSSE   |  |  |
| 4  | Assistant United States Attorney<br>Nevada Bar No. 11573                         |  |  |
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| 6  | Telephone: 702-388-6336<br>Email: krystal.rosse@usdoj.gov                        |  |  |
| 7  | Attorneys for the United States  |  |  |
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| 10 |  |  |  |
| 11 | UNITED STATES DISTRICT COURT   |  |  |
| 12 | DISTRICT OF NEVADA   |  |  |
| 13 | JAMES JACKSON,   |  |  |
| 14 | Plaintiff,   | Case No. 2:16-cv-01892-JAD-GWF                         |  |
| 15 | v.   | STIPULATION TO EXTEND JOINT<br>PRETRIAL ORDER DEADLINE |  |
| 16 | UNITED STATES OF AMERICA,  |  |  |
| 17 | Defendant.   | (First Request)  |  |
| 18 |  |  |  |
| 19 | Pursuant to Local Rules 26-4 and IA 6-1, and this Court's November 8, 2017 Order |  |  |

(ECF No. 24), Plaintiff James Jackson and Defendant United States of America respectfully request a thirty (30) day extension of the Joint Pretrial Order deadline from April 30, 2018 until May 30, 2018. This is the first request for an extension of this deadline.

This request is not for purposes of delay and is sought in good faith. The parties have completed all discovery and, although this request is not filed within twenty-one (21) days of the subject deadline, good cause exists to extend the Joint Pretrial Order deadline as the parties are actively involved in settlement negotiations that require additional time for evaluation and potential approval.

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| 1        | <b>WHEREFORE</b> , for the above reasons, the parties respectfully request the instant          |   |
|----------|---|---|
| 2        | Stipulation extending the Joint Pretrial Order deadline thirty (30) days until May 30, 2018, be |   |
| 3        | granted.  |   |
| 4        | Respectfully submitted this 24th day of April 2018.   |   |
| 5        | LADAH LAW FIRM  | DAYLE ELIESON   |
| 6        |   | United States Attorney  |
| 7        | <u>/s/ Ramzy P. Ladah</u><br>RAMZY P. LADAH, ESQ.<br>517 S. Third Street                        | <u>/s/ Krystal J. Rosse</u><br>KRYSTAL J. ROSSE<br>Assistant United States Attorney |
| 8        | Las Vegas, Nevada 89101   |   |
| 9        | litigation@ladahlaw.com   | Attorneys for the United States   |
| 10       | Attorney for Plaintiff James Jackson  |   |
| 11       |   |   |
| 12       |   |   |
| 13       |   | IT IS SO ORDERED:   |
| 14       |   |   |
| 15       |   | George Foley Jr.  |
| 16       |   | UNITED STATES MAGISTRATE JUDGE  |
| 17       |   | DATED: 4-25-2018  |
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