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Attorney for CLARK COUNTY  
John "Jack" Martin, Patrick Schreiber  
and Marcus McAnally

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

\* \* \* \*

DANIEL MARTIN,  
Plaintiff,

)  
) CASE NO. 2:16-cv-2027-JCM-VCF  
)

CLARK COUNTY, a political subdivision of the  
State of Nevada; JOHN MARTIN in his official  
and/or individual capacities; PATRICK  
SCHREIBER in his official and/or individual  
capacities; MARK HUMPHRIES in his official  
and/or individual capacities; MARCUS  
McANALLY in his official and/or individual  
capacities; RAUL BRACAMONTE in his official  
and/or individual capacities,

Defendants.

**MOTION TO EXTEND TIME TO FILE STIPULATION AND ORDER  
TO DISMISS WITH PREJUDICE**

(First Request)

COMES NOW, Defendants CLARK COUNTY, John "Jack" Martin, Patrick Schreiber  
and Marcus McAnally ("Clark County Defendants") by and through their attorney of record,  
THOMAS D. DILLARD, JR., ESQ., of the law firm OLSON, CANNON, GORMLEY,  
ANGULO & STOBERSKI, and moves to extend the time imposed by minute order [#19] of  
February 14, 2017 for two (2) weeks to file the Stipulation and Order to Dismiss with Prejudice.

This Motion is made and based upon all the pleadings and papers on file herein, the  
attached points and authorities, together with any argument that may be introduced at the time of  
hearing this matter before this Honorable Court.

///

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 1. The parties have completed a release of all claims and the release has been  
3 executed and the stipulation and order to dismiss the case has been prepared and just needs to be  
4 signed following exchange of the check.

5 2. Plaintiff is still employed with Defendant Clark County; consequently, Clark  
6 County's accounting practices requires the check be processed through their payroll system that  
7 is operated by an independent contractor.

8 3. Defense counsel just recently was informed of this particular accounting  
9 requirement and there was some confusion on this issue resulting in some delay on the part of  
10 Clark County in cutting the check and delivering it to Plaintiff. A message was left with  
11 Plaintiff's counsel on February 27, 2017 as he is out of town.

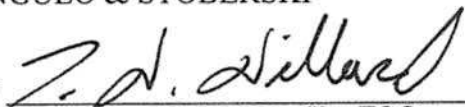
12 4. The check is now being processed through the independent contractor; however,  
13 it will not be processed in time to meet the Court's deadline set in Order [#19].

14 5. Clark County is moving forward with haste to deliver the check in order to get the  
15 stipulation filed and expects to get it accomplished this week.

16 6. Clark County Defendants respectfully request a two week extension out of an  
17 abundance of caution to finalize the settlement so that it will not have to trouble the Court again  
18 should some minor delay unexpectedly arise.

19 DATED this 28 day of February, 2017.

20  
21 OLSON, CANNON, GORMLEY,  
22 ANGULO & STOBERSKI

23 By   
24 THOMAS D. DILLARD, JR., ESQ.  
25 Nevada Bar No. 006270  
26 9950 West Cheyenne Avenue  
27 Las Vegas, Nevada 89129  
28 Attorney for CLARK COUNTY  
John "Jack" Martin, Patrick Schreiber  
and Marcus McAnally

**ORDER**

IT IS SO ORDERED that the Stipulation of Dismissal and Proposed Order must be filed by Tuesday, March 14, 2017. IT IS FURTHER ORDERED that Defendant's motion to extend, Docket No. 20, is hereby GRANTED.

DATED this 1st day of March, 2017.

  
UNITED STATES MAGISTRATE JUDGE  
NANCY J. KOPPE

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