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 10 **MANUEL VERMA & DUANE USHIJIMA**

7 **UNITED STATES DISTRICT COURT**
 8 **DISTRICT OF NEVADA**

9 MANUEL VERMA, an individual, DUANE
 10 USHIJIMA, an individual,

Case No. 2:16-cv-2037-JAD-NJK

11 Plaintiffs,

12 vs.

**STIPULATION AND ORDER TO EXTEND
 TIME FOR PLAINTIFFS MANUEL VERMA
 AND DUANE USHIJIMA TO FILE A
 RESPONSIVE PLEADING TO DEFENDANTS'
 MOTION TO DISMISS PLAINTIFF'S
 COMPLAINT**

13 KEOLIS TRANSIT AMERICA, LLC; DOES 1
 14 through 10 inclusive; ROES
 15 CORPORATIONS/ENTITIES 1 through 10
 16 inclusive; and REGIONAL
 17 TRANSPORTATION COMMISSION OF
 18 SOUTHERN NEVADA; DOES 1 through 10
 19 inclusive; ROES CORPORATIONS/ENTITIES
 20 1 through 10 inclusive,

(FIRST REQUEST)

21 Defendants.

21 Plaintiffs MANUEL VERMA and DUANE USHIJIMA ("Plaintiffs"), by and through their
 22 counsel of record, The Thater Law Group, P.C. and Defendants KEOLIS TRANSIT AMERICA, LLC
 23 ("Keolis") and REGIONAL TRANSPORTATION COMMISSION OF SOUTHERN NEVADA
 24 ("RTC"), by and through their respective counsel Jackson Lewis, P.C., hereby stipulate and agree to
 25 extend the time for Plaintiffs to file a responsive pleading to Defendants Keolis and RTC's Motion to
 26 Dismiss from October 28, 2016 up to and including November 11, 2016.
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1 The parties seek the requested extension because the current date for Plaintiff to respond to the
2 pending defense Motion falls on Friday, October 28, 2016, which is Nevada Day, with Plaintiff's
3 counsel's staff off from work in observance of the state holiday and given Plaintiff's counsel's multiple
4 coinciding deadlines in pending State Court cases during that shortened work week, Plaintiff's counsel
5 requires the additional time to respond to defense Motions.
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7 This stipulation and order is sought in good faith and not for the purpose of delay.

8 DATED this 20th day of October, 2016.
9

10 **THE THATER LAW GROUP, P.C.**

JACKSON LEWIS, P.C.

11 BY: /s/ M. Lani Esteban-Trinidad
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16 *Attorney for Plaintiffs*

BY: /s/ Paul Trimmer
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Dione C. Wrenn, Esq. NV Bar No. 13285
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Attorneys for Defendants

17 **ORDER**

18 IT IS SO ORDERED.

19
20 
21 _____
22 UNITED STATES DISTRICT JUDGE

23 Dated: October 21, 2016.
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