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 Southwest Gas Corporation

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

10 Laura Hoffman, an individual residing in  
 Nevada,  
 11  
 Plaintiff,  
 12  
 v.  
 13  
 SOUTHWEST GAS CORPORATION, a  
 Nevada Registered Foreign Corporation;  
 14 ROE Corporations I through X, inclusive;  
 and DOES I through X, Inclusive,  
 15  
 Defendants.  
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Case No. 2:16-cv-02129-JAD-PAL

**STIPULATION AND ORDER TO EXTEND  
 TIME TO FILE PLAINTIFF’S AMENDED  
 COMPLAINT AND DISPOSITIVE MOTION  
 DEADLINE**  
 (Fifth Request)

18 Pursuant to LR 26-4, all parties hereby stipulate to extend the amended complaint and  
 19 dispositive motion deadlines in this action as follows.

20 **I. INTRODUCTION**

21 1. On November 22, 2016, this Court entered an Order granting the Proposed  
 22 Discovery Plan and Scheduling Order submitted by the parties. ECF No. 14.

23 3. The current dispositive motion deadline is January 15, 2018.

24 4. From November 2017 through December 12, 2017 the parties engaged in  
 25 meaningful settlement discussions, however, the parties were unable to resolve the entire matter.  
 26 The parties subsequently reached agreement for Plaintiff to voluntarily withdraw some of her  
 27 claims.

28 5. On December 22, 2017, the parties submitted a stipulation and order to dismiss with

1 prejudice Plaintiff's Second, Third, Fourth, Eighth, and Ninth Claims. ECF No 29.

2 6. Around the December holidays, Plaintiff's counsel, Bradley Bellisario and his  
3 family contracted the influenza virus.

4 7. Similarly, during the holidays Lead Defense Counsel, Deverie Christensen and her  
5 family contracted the influenza virus.

6 8. As the Court may already be aware from news outlets, the flu season has been  
7 particularly bad this year.

8 9. The parties recognize the stipulation to extend the dispositive motion deadline was  
9 due on December 26, 2017. Due to the unforeseen illnesses experienced by counsel, the parties are  
10 seeking a brief extension of time to meet upcoming deadlines.

11 10. Accordingly, the parties stipulate and agree to extend the deadline for Plaintiff to  
12 file her amended complaint (pursuant to ECF No. 30) to January 22, 2018.

13 11. Further, the parties stipulate and agree to extend the dispositive motion deadline to  
14 February 5, 2018.

15 12. Additionally, the parties seek additional time for Plaintiff to respond to Defendant's  
16 dispositive motion. The parties request Plaintiff's opposition be due on February 26, 2018.

## 17 **II. PROPOSED SCHEDULE**

18 The parties stipulate and agree that:

19 1. **Amended Complaint:** The deadline for Plaintiff to file her amended complaint  
20 pursuant to ECF No. 30 shall be extended up to and including **January 22, 2018**.

21 2. **Dispositive Motions:** The deadline to file dispositive motions shall be extended up  
22 to and including **February 5, 2018**, twenty-one days after the current dispositive motion deadline.  
23 Plaintiff's opposition to Defendant's dispositive motion will be due **February 26, 2018**.  
24 Defendant's Reply will be submitted per the Court's Local Rules.

25 3. **Pre-Trial Order:** If no dispositive motions are filed, the Joint Pretrial Order shall  
26 be filed thirty (30) days after the date set for the filing of dispositive motions. Therefore, the Joint  
27 Pretrial order shall be filed no later than **March 7, 2018**. In the event dispositive motions are filed,  
28 the date for filing the Joint Pretrial Order shall be suspended until thirty (30) days after decision on

1 the dispositive motions or by further order of the Court. The disclosures required by Federal Rules  
2 of Civil Procedure 26(a)(3), and any objections thereto, shall be included in the pretrial order as  
3 required by LR 26-1(e)(6).

4 4. Any deadline not extended in accordance with this Stipulation and Order to Extend  
5 Discovery Deadlines and Scheduling Order set forth above shall remain controlled by the Joint  
6 Discovery Plan and Scheduling Order (ECF No. 14) filed in this matter on November 22, 2016.

7 This stipulation and order is sought in good faith and not for the purpose of delay. Four  
8 prior requests for an extension of scheduling deadlines has been previously made.

9 DATED this 8th day of January, 2018.

10 BELLISARIO LAW

JACKSON LEWIS P.C.

11  
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Southwest Gas Corporation

17 **ORDER**

18 IT IS SO ORDERED January 8, 2018.

19  
20   
21 UNITED STATES DISTRICT JUDGE

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23 4820-4566-8954, v. 1  
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