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12 *Attorneys for Defendants Rama Akash,*
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13 *Jo Gentry, Brian Kerby, John King,*
Timothy Knatz, Joseph Kobrick,
14 *Gillian Lambey, Ana Leos,*
Rashonda Smith, and Elvin Worthey
15

16 UNITED STATES DISTRICT COURT
17 DISTRICT OF NEVADA

18 CURTIS L. DOWNING,

19 Plaintiff,

20 vs.

Doc. 167

21 JO GENTRY, et al.,

22 Defendants.

Case No. 2:16-cv-02632-RFB-BNW

**STIPULATION AND PROPOSED
ORDER TO EXTEND THE DEADLINE
TO FILE THE JOINT PRE-TRIAL
ORDER**

23 Plaintiff Curtis L. Downing, and Defendants, Rama Akash, Adam Burnside, Frank
24 Dreesen, Jo Gentry, Brian Kerby, John King, Timothy Knatz, Joseph Kobrick, Gillian
25 Lambey, Ana Leos, Rashonda Smith, and Elvin Worthey by and through counsel, Aaron
26 D. Ford, Attorney General of the State of Nevada, Douglas R. Rands, Senior Deputy
27 Attorney General, Nathan M. Claus, Deputy Attorney General, and Victoria C. Corey,
28 Deputy Attorney General, hereby submit their stipulation and agreement to extend the
deadline for the filing of their Joint Pre-Trial Order and respectfully request that the Court

1 extend the deadline to file a proposed joint pretrial order to June 10, 2024. The Parties are
2 requesting the modification in good faith and the request is supported by good cause.

3 LR 26-3 requires that the extension of any date set by the discovery plan,
4 scheduling order, or other order must—as well as satisfying the requirements of LR IA 6-
5 1 to explain the reasons an extension is needed—demonstrate good cause for the
6 extension.

7 Good cause to extend the deadline to file a proposed joint pretrial order exists.
8 Plaintiff has been unable to completely review the proposed Joint Pretrial Order and will
9 need a week to complete his review. Plaintiff and Defense Counsel have been working
10 well together and believe they can continue working together to attempt to streamline
11 this trial and potentially stipulate to evidence, facts, and potential witnesses.

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1 Based on the foregoing, the Parties submit that good cause exists to grant the
2 requested extension and that the deadline to submit a proposed joint pretrial order be
3 moved to June 10, 2024.

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5 DATED this 3rd day of June, 2024
6 and respectfully submitted by:

7 AARON D. FORD
8 Attorney General

9 /s/ Nathan M. Claus

10 DOUGLAS R. RANDS, Bar No. 3572
11 VICTORIA C. COREY (Bar No. 16364)
12 NATHAN M. CLAUS (Bar No. 15889)
13 555 E. Washington Avenue, Suite 3900
14 Las Vegas, NV 89101
15 nclaus@ag.nv.gov

16 *Attorneys for Defendant*

17 DATED this ____ day of June, 2024
18 and approved as to form and content by:

19 /s/ Curtis Downing
20 CURTIS DOWNING

21 *Plaintiff*

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IT IS SO ORDERED:

29 *Deborah Wefer*
30 UNITED STATES MAGISTRATE JUDGE

31 Dated: June 4, 2024

1 **CERTIFICATE OF SERVICE**

2 I certify that I am an employee of the State of Nevada, Office of the Attorney
3 General, and that on _____ 2024, I electronically filed the foregoing, ***, via this
4 Court's electronic filing system. Parties that are registered with this Court's electronic
5 filing system will be served electronically. For those parties not registered, service was
6 made by depositing a copy for mailing in the United States Mail, first-class postage
7 prepaid, addressed to the following:

8 Curtis Downing, #18675
9 Southern Desert Correctional Center
10 P.O. Box 208
11 Indian Springs, Nevada 89070

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13 _____
14 An employee of the
15 Office of the Attorney General
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