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 9 NGM Insurance Company

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 LARRY MOLDT, an individual,

13 Plaintiff,

14 vs.

15 NGM INSURANCE COMPANY, and  
 16 DOES I through X, inclusive,

17 Defendants.

Case No. 2:16-cv-02828-JAD-VCF

**STIPULATION AND ORDER FOR  
 EXTENSION OF DEFENDANT'S  
 RESPONSES TO PLAINTIFF'S FIRST  
 RFA, INTERROGATORIES AND  
 SECOND RFP (First Request)**

18 Pursuant to Federal Rule of Civil Procedure 29(b) and Local Rules IA 6-1 and IA  
 19 7-1, the parties hereby submit the following Stipulation and Order for Extension of  
 20 Defendant's Responses to Plaintiff's First RFA, Interrogatories and Second RFP (First  
 21 Request) to extend the deadline to respond to these written discovery requests by three  
 22 business days.

23 Defendant's responses to the above-referenced discovery requests are currently  
 24 due July 12, 2017. Pursuant to the agreement between the parties, Defendant's discovery  
 25 responses may be extended by three business days, making the new deadline July 17,  
 26 2017. Due to defense counsel's active litigation calendar and the recent holiday, in  
 27 addition to Defendant's representative's busy schedule, Defendant is unable to respond to  
 28 the discovery requests by the current deadline. This short extension of time will allow  
 Defendant to review and approve the discovery responses to ensure accuracy.

1 This is the first stipulation for extension of time for Defendant to respond to  
2 Plaintiff's First Set of Requests for Admissions, First Set of Interrogatories, and Second  
3 Set of Requests for Production. This short extension of time will not delay any deadlines  
4 in this matter.

5 DATED: July 12, 2017

6 LAW OFFICES OF STEVEN M. BURRIS GRAIF BARRETT & MATURA, P.C.  
7

8 By: /s/ Sam Benham  
9 Sam Benham  
10 Attorneys for Plaintiff  
Larry Moldt

By: /s/ Kevin C. Barrett  
Kevin C. Barrett  
Attorneys for Defendant  
NGM Insurance Company

11  
12  
13 **ORDER**

14 **IT IS SO ORDERED.**

15  
16 

17 UNITED STATES MAGISTRATE JUDGE

18  
19 DATED: 7-13-2017

20  
21 Submitted by:

22 GRAIF BARRETT & MATURA, P.C.  
23

24 By: /s/ Kevin C. Barrett  
25 Kevin C. Barrett  
26 Attorneys for Defendant  
NGM Insurance Company