| 1  | DANIEL T. HAYWARD  |
|----|--|
| 2  | Nevada State Bar No. 5986<br>LAXALT & NOMURA, LTD.   |
| 3  | 9790 Gateway Drive, Suite 200  |
| 4  | Reno, Nevada 89521<br>Tel. (775) 322-1170  |
| 5  | Fax (775) 322-1865<br>dhayward@laxalt-nomura.com   |
| 6  | Attorneys for Defendants<br>Edward Etkin, and  |
| 7  | Law Offices of Edward Etkin, Esq. PC   |
| 8  | UNITED STATES DISTRICT COURT   |
| 9  | DISTRICT OF NEVADA   |
| 10 | SHANA LEE MCCART-POLLAK, ) Case No. 2:17-cv-00042-RFB-CWH                                      |
| 11 | )<br>Plaintiff, )  |
| 12 | vs.  |
| 13 | EDWARD ETKIN, an individual; LAW   |
| 14 | OFFICES OF EDWARD ETKIN, ESQ. PC )<br>a New York business entity; DOES I )                     |
| 15 | Through X; ROE BUSINESS ENTITIES )   I through X, inclusive, )                                 |
| 16 | )  |
| 17 | Defendants. )  |
| 18 | STIPULATION / JOINT MOTION AND PROPOSED ORDER  |
| 19 | REGARDING DUE DATE FOR PLAINTIFF'S OPPOSITION TO<br>DEFENDANTS' MOTIONS IN LIMINE (ECF NO. 91) |
| 20 |  |
| 21 | Plaintiff Shana Lee McCart-Pollak, in pro per, and Defendants Edward Etkin and the             |
| 22 | Law Offices of Edward Etkin, Esq. PC, by and through their undersigned counsel, hereby         |
| 23 | stipulate, and jointly move the Court to order, that Plaintiff may have until and including    |
| 24 | Tuesday, December 4, 2018 by which to file and serve her Opposition to Defendant's Motions     |
| 25 | in Limine (ECF No. 91).  |
| 26 | On November 9, 2018 Defendants filed their Motions in Limine (ECF No. 91). Plaintiff           |
| 27 | has requested an extension of time until and including Tuesday, December 4, 2018 by which to   |
| 28 | respond to the Motions in Limine due to time constraints related to the Thanksgiving Holiday,  |
|    | 1  |
| 1  | Dockets.Justia   |

| 1                | related holiday plans, and her daughter's birthday, as well as the length and scope of the            |
|------------------|---|
| 2                | Motions in Limine. Defendants have no objection to this request, and note that no trial date or       |
| 3                | pretrial conference has yet been scheduled.   |
| 4                | WHEREFORE, the parties hereby stipulate, and jointly move the Court to order, that                    |
| 5                | Plaintiff may have until and including Tuesday, December 4, 2018 by which to file and serve           |
| 6                | her Opposition to Defendant's Motions in Limine (ECF No. 91).   |
| 7                |   |
| 8                | DATED this 13 <sup>th</sup> day of November, 2018. DATED this 13 <sup>th</sup> day of November, 2018. |
| 9                | LAXALT & NOMURA, LTD.   |
| 10               | /s/ Shana McCart-Pollak   |
| 11               | DANIEL T. HAYWARD SHANA McCART-POLLAK   |
| 12               | Nevada State Bar No. 5986524 Blanche Court9790 Gateway Drive, Suite 200Henderson, Nevada 89052        |
| 13               | Reno, Nevada 89521 Tel. (702) 439-2263   Tel. (775) 322-1170 lotsoflovebuddies@yahoo.com              |
| 14               | Fax (775) 322-1865Plaintiff in Pro Perdhayward@laxalt-nomura.comPlaintiff in Pro Per                  |
| 15               | Attorneys for Defendants  |
| 16               | Edward Etkin, and<br>Law Offices of Edward Etkin, Esq. PC   |
| 17               |   |
| 18               | ORDER   |
| 19               | IT IS SO ORDERED.   |
| 20               | R   |
| 21               | RICHARD F. BOULWARE, II   |
| 22               | United States District Judge  |
| 23               | DATED this <u>19th</u> day of November, 2018.   |
| 24               |   |
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