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17 **UNITED STATES DISTRICT COURT**
 18 **DISTRICT OF NEVADA**

19 KARISMA GARCIA,
 20 Plaintiff,
 21 vs.
 22 STATE OF NEVADA, et al.,
 23 Defendants.

Case No. 2:17-cv-00359-APG-VCF

**JOINT MOTION TO EXTEND
 DISPOSTIVE MOTION DEADLINE
 (FOURTH REQUEST)**

25 That the Parties, hereby move to extend the time to complete dispositive motions
 26 from April 1, 2021 until June 1, 2021.

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1 **I. PROCEDURAL POSTURE**

2 **A. Discovery Completed pursuant to Local Rule 26-3¹**

3 To date, Garcia disclosed all of the documents in her possession on July 6, 2020.
4 Defendants disclosed all of the documents in its possession on August 11, 2020. Defendants
5 provided Garcia with a PDF of all prison medical files on January 26, 2021. Garcia provided
6 a first supplement to her initial disclosures on March 1, 2021.

7 **B. Reasons that Dispositive Motions Cannot be Completed within**
8 **the Date Set by Scheduling Order**

9 Defendants' counsel is currently preparing for an emergency appeal in one of the two
10 preliminary injunction cases he defended in March. In addition to the unexpected appeal,
11 counsel faces several dispositive deadlines between March 29th and April 12th. Counsel is
12 also required to take a mandatory furlough day April 5th. Unfortunately, an immediate
13 family of Defendants' counsel passed away this month after contracting COVID-19.
14 Counsel will be on bereavement leave the week of April 19th.

15 Under the circumstances the Parties have agreed to a 60-day extension.

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21 ¹ LR 26-3. EXTENSION OF SCHEDULED DEADLINES:

22 A motion or stipulation to extend any date set by the discovery plan, scheduling order, or
23 other order must, in addition to satisfying the requirements of LR IA 6-1, be supported by
24 a showing of good cause for the extension. A motion or stipulation to extend a deadline set
25 forth in a discovery plan must be received by the court no later than 21 days before the
26 expiration of the subject deadline. A request made within 21 days of the subject deadline
must be supported by a showing of good cause. A request made after the expiration of the
subject deadline will not be granted unless the movant also demonstrates that the failure
to act was the result of excusable neglect. A motion or stipulation to extend a discovery
deadline or to reopen discovery must include:

- 27 (a) A statement specifying the discovery completed;
28 (b) A specific description of the discovery that remains to be completed;
(c) The reasons why the deadline was not satisfied or the remaining discovery
was not completed within the time limits set by the discovery plan; and
(d) A proposed schedule for completing all remaining discovery.

1 **III. CONCLUSION**

2 Based upon the foregoing reasons, the Parties request that this Court grant the
3 requested relief and continue deadlines as requested herein.

<p>5 Dated 30th day of March 2021.</p> <p>6 By: <u>/s/Lisa A.Rasmussen</u></p> <p>7 Lisa A. Rasmussen, Esq. 8 Law Offices of Kristina Wildeveld & 9 Associates 10 550 E. Charleston Blvd. 11 Las Vegas, NV 89101 www.veldlaw.com <i>Attorneys for Plaintiff</i></p>	<p>Dated 30th day of March 2021.</p> <p>By: <u>/s/ Christopher M. Guy</u></p> <p>Christopher M. Guy, Esq. Deputy Attorney General Office of the Nevada Attorney General 555 E. Washington Avenue, #3900 Las Vegas, Nevada 89101 <i>Attorneys for Defendants</i></p>
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13 IT IS SO ORDERED

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UNITED STATES MAGISTRATE JUDGE

18 March 31, 2021