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

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

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

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

26 The Parties hereby move to extend the time to complete dispositive motions from  
 27 June 1, 2021, to August 2, 2021. Good cause supports this extension request as it will allow  
 28 the parties to engage in settlement discussions to resolve this matter.

1 **I. PROCEDURAL POSTURE**

2 **A. Discovery Completed Pursuant To Local Rule 26-3<sup>1</sup>**

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 26, 2021.

7 **B. Reasons That Dispositive Motions Cannot Be Completed Within The**  
8 **Date Set By Scheduling Order**

9 On Friday, May 21, 2021, Senior Deputy Attorney General Katlyn M. Brady was  
10 assigned to assist in this matter and draft any dispositive motions. Counsel spent the  
11 following weekend, and several workdays, familiarizing herself with this matter.

12 Further, defense counsel and plaintiff's counsel have begun preliminary discussions  
13 regarding settling this matter prior to dispositive motions. Both parties believe a  
14 settlement in this matter may be possible. Thus, both parties have agreed to extend the  
15 deadline for dispositive motions to allow for settlement discussions.

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18 <sup>1</sup> LR 26-3. EXTENSION OF SCHEDULED DEADLINES:

19 A motion or stipulation to extend any date set by the discovery  
20 plan, scheduling order, or other order must, in addition to  
21 satisfying the requirements of LR IA 6-1, be supported by a  
22 showing of good cause for the extension. A motion or stipulation  
23 to extend a deadline set forth in a discovery plan must be  
24 received by the court no later than 21 days before the expiration  
25 of the subject deadline. A request made within 21 days of the  
26 subject deadline must be supported by a showing of good cause.  
27 A request made after the expiration of the subject deadline will  
28 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:

- (a) A statement specifying the discovery completed;
- (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 this 1st day of June, 2021</p> <p>6</p> <p>7 By: <u>/s/ Lisa A. Rasmussen</u> Lisa A. Rasmussen, Esq. Law Offices of Kristina Wildeveld &amp; Associates 550 E. Charleston Blvd. Las Vegas, NV 89101 T. (702) 222-0007   F. (702) 222-0001 <a href="http://www.veldlaw.com">www.veldlaw.com</a> <i>Attorneys for Plaintiff</i></p>	<p>5 DATED this 1st day of June, 2021</p> <p>6</p> <p>7 By: <u>/s/ Katlyn M. Brady</u> KATLYN M. BRADY Senior 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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15 UNITED STATES MAGISTRATE JUDGE

16 6-3-2021

17 DATE: \_\_\_\_\_