

1 LYSSA S. ANDERSON
Nevada Bar No. 5781
2 RYAN W. DANIELS
Nevada Bar No. 13094
3 KRISTOPHER J. KALKOWSKI
Nevada Bar No. 14892
4 KAEMPFER CROWELL
1980 Festival Plaza Drive, Suite 650
5 Las Vegas, Nevada 89135
Telephone: (702) 792-7000
6 Fax: (702) 796-7181
landerson@kcnvlaw.com
7 rdaniels@kcnvlaw.com
kkalkowski@kcnvlaw.com
8 *Attorneys for Defendants Eddie Scott,*
Kevin Patimeteeporn, and Timothy Dorion

10 UNITED STATES DISTRICT COURT

11 DISTRICT OF NEVADA

12 LUIS CERVANTES,

CASE NO.: 2:17-cv-00562-MMD-DJA

13 Plaintiff,

14 vs.

**STIPULATION TO EXTEND DEADLINE
TO SUBMIT JOINT PRETRIAL ORDER**

(First Request)

15 LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, a political subdivision of the
State of Nevada; EDDIE SCOTT, P#15631, in
16 his individual and official capacities; KEVIN
PATIMETEEPORN, P#14529, in his
17 individual and official capacities; and
TIMOTHY DORION, P#14942, in his
18 individual and official capacities,

19 Defendants.

20 The above-referenced parties, by and through their counsel of record, hereby agree and
21 request that the deadline for the parties to submit the Joint Pretrial Order, currently set for May 21,
22 2021, be extended and/or stayed pending a ruling on Defendants Eddie Scott, Kevin Patimeteeporn
23 and Timothy Dorian's ("LVMPD Defendants") Motion for Reconsideration filed at ECF No. 122.
24 This is the first request regarding the deadline to file the Joint Pretrial Order between the parties.

1 As noted above, the LVMPD Defendants filed a Motion for Reconsideration on March 22,
2 2021, following this Court's ruling on dispositive motions. [ECF No. 122]. Plaintiff requested an
3 extension of the response deadline for that Motion, which the Court granted and set a new deadline
4 of May 5, 2021. [ECF No. 124]. In addition, a Settlement Conference was recently held on April
5 21, 2021. The parties did not reach a resolution.

6 There is good cause to stay/extend the deadline to submit a Joint Pretrial Order. The
7 Motion for Reconsideration is not yet fully briefed and the Court has not considered it. The parties
8 believe it is in their best interest and the best interest of this Court to stay filing the Joint Pre-Trial
9 Order until all pre-trial matters are fully resolved. This will prevent any unnecessary confusion
10 and/or efforts by the parties and Court that may be moot depending on the Court's ruling.

11 Based upon the forgoing, the parties make this request jointly and ask the Court to stay the
12 deadline for filing a Joint Pre-Trial Order until thirty (30) days after this Court's ruling on the
13 Motion for Reconsideration at ECF No. 122.

14 DATED this 27th day of April, 2021.

15 KAEMPFER CROWELL

HATFIELD & ASSOCIATES, LTD.

16 By: /s/ Kristopher Kalkowski

By: /s/ Trevor Hatfield

17 Lyssa Anderson (NV Bar # 5781)
18 Ryan Daniels (NV Bar # 13094)
19 Kristopher Kalkowski (NV Bar #
14892)
1980 Festival Plaza Dr. Ste. 650
Las Vegas, Nevada 89135

Trevor J. Hatfield (NV Bar # 7373)
703 S. Eighth Street
Las Vegas, Nevada 89101

Attorney for Plaintiff Luis Cervantes

20 *Attorneys for Defendants*
21 *Officers Eddie Scott, Kevin*
Patimeteeporn and Timothy Dorion

ORDER

22 **IT IS SO ORDERED.**

23 Dated this 28th day of April, 2021.

24 

UNITED STATES DISTRICT COURT JUDGE