

1 ADAM PAUL LAXALT
 Attorney General
 2 CAMERON P. VANDENBERG
 Chief Deputy Attorney General
 3 Nevada Bar No. 4356
 4 DOMINIKA J. BATTEN
 Deputy Attorney General
 5 Nevada Bar No. 12258
 6 State of Nevada
 Office of the Attorney General
 7 5420 Kietzke Lane, Suite 202
 8 Reno, NV 89511
 (775) 687-2103 (phone)
 9 (775) 688-1822 (fax)
 Email: cvandenberg@ag.nv.gov
 10 dbatten@ag.nv.gov
 Attorneys for Defendants
 Nevada Department of Transportation,
 11 Wilson Marshall, and Sonnie Braih
 12

13 **UNITED STATES DISTRICT COURT**
 14 **DISTRICT OF NEVADA**

15 KENDRICK CRAWFORD,
 16 Plaintiff,
 17 vs.
 18 NEVADA DEPARTMENT OF
 TRANSPORTATION, a Department of the
 19 State of Nevada; WILSON MASHALL, an
 individual employed by the State of Nevada;
 20 and SONNIE BRAIH, an individual
 employed by the State of Nevada,
 21 Defendants.
 22

Case No. 2:17-cv-00655-GMN-PAL

**STIPULATION AND ORDER
 REQUESTING TIME FOR
 DEFENDANTS TO REPLY TO
 PLAINTIFF’S RESPONSE TO
 DEFENDANTS’ MOTION FOR
 SUMMARY JUDGMENT**
(First Request)

23 Plaintiff, KENDRICK CRAWFORD (hereinafter “Plaintiff”), by and through his
 24 counsel Trevor J. Hatfield, of Hatfield & Associates, Ltd., and Defendants NEVADA
 25 DEPARTMENT OF TRANSPORTATION, a Department of the State of Nevada, WILSON
 26 MARSHALL and SONNIE BRAIH, individuals employed by the NEVADA DEPARTMENT
 27 OF TRANSPORTATION (NDOT), by and through legal counsel, Adam Paul Laxalt, Attorney
 28 General, Cameron P. Vandenberg, Chief Deputy Attorney General, and Dominika J. Batten,

1 Deputy Attorney General, and do hereby stipulate and agree to an extension of time for
2 Defendants to reply to Plaintiff's Response to Defendants' Motion for Summary Judgment
3 (ECF #35) that was filed on May 11, 2018. Defendants' reply is currently due on May 25, 2018.

4 This request is submitted pursuant to LR IA 6-1, 6-2, and LR 7-1 and is the parties' first
5 request for an extension of time for Defendants to file their reply to Plaintiff's Response to
6 Defendants' Motion for Summary Judgment (ECF #35). The parties make this request because
7 Defendants' counsel was out of the office for three weeks of emergency family leave, returning
8 to work last week. Additionally, to facilitate settlement negotiations, the parties seek to further
9 extend the time for Defendants to file their reply to fourteen days after the parties attend the
10 settlement conference scheduled by the Court (ECF #36) for July 11, 2018, before Magistrate
11 Judge Peggy A. Leen. Accordingly, NDOT shall have up to and including July 25, 2018, to
12 reply to Plaintiff's Response to Defendants' Motion for Summary Judgment (ECF #35).

13 Dated: May 23, 2018

Dated: May 23, 2018

14 ADAM PAUL LAXALT
Attorney General

HATFIELD & ASSOCIATES, LTD.

15 By: /s/ Dominika J. Batten
16 CAMERON P. VANDENBERG
17 Chief Deputy Attorney General
Nevada State Bar No. 4356
18 DOMINIKA J. BATTEN
19 Deputy Attorney General
Nevada State Bar No. 12258
20 Office of the Attorney General
5420 Kietzke Lane, Suite 202
21 Reno, NV 89511
Attorneys for Defendants

By: /s/ Trevor J. Hatfield
TREVOR J. HATFIELD, ESQ.
Nevada State Bar No. 7373
703 S. Eighth St.
Las Vegas, NV 89101
(702) 388-4469 Tel
(702) 386-9825 Fax
thatfield@hatfieldlawassociates.com
Attorney for Plaintiff

22 **ORDER**

23
24 **IT IS SO ORDERED.**

25
26
27 Dated this 23 day of May, 2018.



Gloria M. Navarro, Chief Judge
UNITED STATES DISTRICT COURT