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7			
8	Attorneys for Defendants Clark County School District,		
9	Edward Goldman, James Ketsaa and Christopher Klemp		
10	UNITED STATE	S DISTRICT COURT	
11	UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA		
12			
13	DANIEL M. BURGESS, an individual; ANTHONY RUSSO, an individual,	Case No. 2:17-cv-00805-GMN-VCF	
14	Plaintiffs,	STIPULATION FOR EXTENSION OF	
15	VS.	TIME TO FILE DISCOVERY PLAN/SCHEDULING ORDER	
16	CLARK COUNTY SCHOOL DISTRICT, a political subdivision; EDWARD GOLDMAN,	(Second Request)	
17	an individual; JAMES KETSAA, an individual; CHRISTOPHER KLEMP, an	<u></u>	
18	individual,		
19	Defendants.		
20	It is hereby STIPULATED AND	AGREED between Plaintiff Daniel M. Burgess	
21	("Burgess") and Defendants, by and through their undersigned counsel, that the parties will have		
<u></u>	additional time to submit their proposed discovery plan up to and including August 30, 2017 This		

additional time to submit their proposed discovery plan up to and including August 30, 2017. This
extension is requested as the Early Neutral Evaluation Session held on July 25, 2017 resulted in
meaningful settlement discussions, and the parties wish to avoid incurring additional costs and fees
while they actively pursue settlement. The proposed discovery plan/scheduling order is currently
due August 9, 2017. This is the second request for an extension of time to file the proposed
discovery plan/scheduling order.

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1	The above stipulated extensions do not affect the deadlines relating to plaintiff, Anthony	
2	Russo. Plaintiff Russo and Defendants will proceed in the ordinary course as to all scheduled	
3	deadlines.	
4		
5	DATED this 28th day of July, 2017.	DATED this 28th day of July, 2017.
6	GREENBERG TRAURIG, LLP	MAIER GUTIERREZ & ASSOCIATES
7	// Kana D. Handaida	/// Inner D. Main
8	/s/ Kara B. Hendricks MARK E. FERRARIO, ESQ.	/s/ Jason R. Maier JOSEPH A. GUTIERREZ, ESQ.
9	Nevada Bar No. 1625 KARA B. HENDRICKS, ESQ.	Nevada Bar No. 9046 JASON R. MAIER, ESQ.
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11	Las Vegas, NV 89169	Las Vegas, NV 89148
12	Counsel for Defendants	Counsel for Plaintiff Daniel M. Burgess
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14		
15		IT IS SO ORDERED.
16		Can Realer
17		
18		UNITED STATES MAGISTRATE JUDGE Dated: <u>July 31, 2017</u>
19		Datea. <u>Daty 01, 2011</u>
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