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7 *Attorneys for Defendants*  
 8 *Brian Williams and Jay Barth*

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 DONALD E. MITCHELL, JR.,  
 12 Plaintiff,  
 13 v.  
 14 BRIAN WILLIAMS, SR., *et al.*,  
 15 Defendants.

USDC 2:19-cv-01066-APG-DJA  
 USDC 2:19-cv-01933-JAD-DJA  
 USDC 2:20-cv-01651-APG-VCF  
 USDC 2:17-cv-00686-APG-DJA; 9th Cir.  
 19-17350  
 USDC 2:17-cv-00986-JAD-BNW; 9th Cir.  
 20-15912  
 USDC 2:19-cv-00190-GMN-DJA

**JOINT REQUEST FOR FOURTEEN  
 ADDITIONAL DAYS TO FILE  
 STIPULATION AND ORDER FOR  
 DISMISSAL PURSUANT TO ECF  
 NO. 20**

19  
 20 Defendants, Eric Gomez, Kelly Quinn, Jay Barth, Brian Williams, Michael Dante,  
 21 Louis Wallace, Ryan Hesler, Devona Jimenez, Patrick Moreda, Anthony Herrera, Ronald  
 22 Oliver, John Borrowman, Jennifer Nash, Carrie Alvarado, Timothy Filson, Jerry Howell,  
 23 Bianca Knight-Groover, Dwight Neven, Perry Russell, and Anthony Warren, all of whom  
 24 either named in defendants in one or more of the above named cases, by and through  
 25 counsel, Aaron D. Ford, Nevada Attorney General, D. Randall Gilmer, Chief Deputy  
 26 Attorney General, Alexander J. Smith and Dawn R. Jensen, Deputy Attorney Generals, of  
 27 the State of Nevada, Office of the Attorney General, and Plaintiff Donald Mitchell by and  
 28 through counsel Diana Ebron, Esq., who was specifically appointed to represent Mitchell

1 under the United States District Court for the District of Nevada's Pro Bono Program in  
2 Case No. 2:17-cv-00686-APG-DJA, as well as for purposes of the Global Settlement  
3 Conference, hereby jointly request an extension of fourteen (14) days to file the Stipulation  
4 and Order for Dismissal.

5 A global settlement conference was held on January 27, 2022 regarding Case Nos.  
6 2:19-cv-01066-APG-DJA, 2:19-cv-01933-JAD-DJA, 2:19-cv-01651-APG-VCF, 2:17-cv-  
7 00686-APG-DJA, 9th Cir. 19-17350, 2:17-cv-00986-JAD-BNW, 9th Cir. 20-15912, 2:19-cv-  
8 00190-GMN-DJA. A settlement was reached. It was ordered that the Stipulation and  
9 Order for Dismissal be filed no later than February 28, 2022. ECF No. 20<sup>1</sup>.

10 The parties are engaged in ongoing efforts to finalize this settlement. The documents  
11 have been prepared and provided to Plaintiff's counsel. Plaintiff's counsel secured an in  
12 person visit with Plaintiff to review the documents and obtain signatures. However, upon  
13 arrival at the institution, Plaintiff's counsel was unable to meet with Plaintiff due to a  
14 positive COVID-19 test. The Office of the Attorney General is currently assisting with  
15 alternative arrangements. However additional time is needed to file the Stipulation and  
16 Order for Dismissal.

17 Therefore, the parties jointly request an extension of fourteen (14) days, or until  
18 Monday, March 14, 2022, to file the Stipulation and Order for Dismissal.

19 DATED this 28<sup>th</sup> day of February, 2022.

20 AARON D. FORD  
21 Attorney General

22 By: /s/ Dawn R. Jensen  
23 DAWN R. JENSEN (Bar No. 10933)  
24 Deputy Attorney General

*Attorneys for Defendants*

25 IT IS SO ORDERED.

26 Dated: March 1, 2022

27   
28 \_\_\_\_\_  
UNITED STATES MAGISTRATE JUDGE

<sup>1</sup> Case No 2:20-cv-01651-APG-VCF

**CERTIFICATE OF SERVICE**

I certify that I am an employee of the State of Nevada, Office of the Attorney General, and that on the February 28, 2022, I electronically filed the foregoing **JOINT REQUEST FOR FOURTEEN ADDITIONAL DAYS TO FILE STIPULATION AND ORDER FOR DISMISSAL PURSUANT TO ECF NO. 20** via this Court's electronic filing system.

Donald Mitchell, #94796  
High Desert State Prison  
P.O. Box 650  
Indian Springs, Nevada 89070  
Email: HDSP\_LawLibrary@doc.nv.gov  
*Plaintiff, Pro Se*

/s/ Cathy L. Mackerl  
CATHY L. MACKERL, an employee of the  
Office of the Nevada Attorney General