

Marc J. Randazza, NV Bar # 12265  
 Alex J. Shepard, NV Bar # 13582  
 RANDAZZA LEGAL GROUP, PLLC  
 2764 Lake Sahara Drive, Suite 109  
 Las Vegas, NV 89117  
 Telephone: 702-420-2001  
 ecf@randazza.com

*Attorneys for Plaintiff,  
 John Sabatini*

**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

JOHN SABATINI, an individual,  
  
 Plaintiff,

vs.

LAS VEGAS METROPOLITAN POLICE  
 DEPARTMENT,  
  
 Defendant.

Case No. 2:17-cv-01012-JAD-NJK

**STIPULATION TO EXTEND DEADLINE  
 TO FILE DISPOSITIVE MOTIONS**

**(Second Request)**

CHARLES MOSER,

Plaintiff,

vs.

DEVIN BALLARD, an individual, *et al.*,  
  
 Defendants.

Case No. 2:17-cv-01704-JAD-NJK

Pursuant to LR 6-1 and LR 26-4, the parties, by and through their respective counsel of record, hereby stipulate and request that this Court extend the deadline for all parties to file dispositive motions in the above-captioned Consolidated case for a period of 14 days, up to and including Thursday, June 28, 2018.

1 In support of this Stipulation and Request, the parties state as follows:

2 All discovery in this matter is complete. However, due to scheduling issues  
3 and unexpected litigation emergencies, the parties have not been able to  
4 dedicate adequate time to preparing the dispositive motions that they plan to  
5 file. The current deadline to file dispositive motions is June 14, 2018. The parties  
6 plan to file one or more motions for summary judgment and, given the  
7 complexity of issues involved in such motions, require additional time to prepare  
8 them. The parties expect that a 14-day extension until June 28, 2018 will provide  
9 sufficient time.

10 Applications to extend any date set by the discovery plan, scheduling  
11 order, or other order must, in addition to satisfying the requirements of LR 6-1, be  
12 supported by a showing of good cause for the extension. In accordance with  
13 LR 26-4, all motions or stipulations to extend a deadline set forth in a discovery  
14 plan shall be received by the Court no later than twenty-one (21) days before  
15 the expiration of the subject deadline. A request made after the expiration of  
16 the subject deadline shall not be granted unless the movant demonstrates that  
17 the failure to act was the result of excusable neglect. Any motion or stipulation  
18 to extend a deadline or to reopen discovery shall include:

- 19 (a) A statement specifying the discovery completed;
- 20 (b) A specific description of the discovery that remains to be completed;
- 21 (c) The reasons why the deadline was not satisfied or the remaining  
22 discovery was not completed within the time limits set by the discovery  
23 plan; and
- 24 (d) A proposed schedule for completing all remaining discovery.

25 It is not good cause for a late request to extend discovery that the parties  
26 informally postponed discovery. No stipulations are effective until approved by  
27 the Court, and "[a]ny stipulation that would interfere with any time set for

completion of discovery, for hearing of a motion, or for trial, may be made only with approval of the Court." See LR 7-1(b).

**IT IS SO STIPULATED.**

Dated this 11<sup>th</sup> day of June 2018.

RANDAZZA LEGAL GROUP, PLLC

/s/ Alex J. Shepard

Marc J. Randazza, NV Bar # 12265

Alex J. Shepard, NV Bar # 13582

RANDAZZA LEGAL GROUP, PLLC

2764 Lake Sahara Drive, Suite 109

Las Vegas, NV 89117

*Attorneys for Plaintiff*

*John Sabatini*

MARQUIS AURBACH COFFING

/s/ Nicholas D. Crosby

Nicholas D. Crosby, NV Bar # 8996

10001 Park Run Drive

Las Vegas, Nevada 89145

*Attorney for Defendants*

LAW OFFICE OF DANIEL MARKS

/s/ Adam Levine

Daniel Marks, NV Bar # 2003

Adam Levine, NV Bar # 4673

610 South Ninth Street

Las Vegas, NV 89101

*Attorneys for Plaintiff*

*Charles Moser*

**IT IS SO ORDERED.**

  
UNITED STATES MAGISTRATE JUDGE

**DATED:** June 12, 2018