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2 CLARK COUNTY SCHOOL DISTRICT  
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*Attorney for Clark County School District*

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9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 O.R., by and through her Parents, Sig and  
12 Lori Rogich and Sig and Lori Rogich,  
13 Individually,

14 Plaintiffs,

15 v.

16 CLARK COUNTY SCHOOL DISTRICT,

17 Defendant.  
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CASE NO.: 2:17-cv-01541-RFB-NJK

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23 **STIPULATION AND ORDER TO**  
**EXTEND TIME TO RESPOND TO**  
**PLAINTIFFS' MEMORANDUM**  
**DETAILING RELIEF SOUGHT,**  
**FILED PURSUANT TO ECF No. 73**  
**(First Request)**

24 COMES NOW, Plaintiff and Defendant Clark County School District ("the CCSD"), by  
25 and through their attorneys of record, and hereby stipulate and agree that the CCSD may have up  
26 to and including September 7, 2020, to respond to **PLAINTIFFS' MEMORANDUM**  
27 **DETAILING RELIEF SOUGHT, FILED PURSUANT TO ECF No. 73** (hereinafter referred  
28 to as "the Memorandum") in this matter. The Court ordered that the Motion be served and was  
served on August 17, 2020. The current response date is August 31, 2020. This is the first  
request for an extension to the response due date.

1 This request is being entered for good cause, in good faith, and not for reason of delay.  
2 On or about, Thursday, August 27, 2020, the CCSD's document server was hacked causing it to  
3 become inaccessible. As of today's date, the server continues to be inaccessible although steps  
4 have been taken to correct the situation. CCSD's counsel has been actively working on a response  
5 to the Memorandum, however, completion of the CCSD's response has been significantly  
6 hampered by her ability to access essential documents held on the document server.  
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9 THEREFORE, the parties respectfully request the response due date be extended seven (7)  
10 days up to and including September 7, 2020.

11 Dated: August 31, 2020.

Dated: August 31, 2020.

12 CLARK COUNTY SCHOOL DISTRICT  
13 OFFICE OF THE GENERAL COUNSEL

FREEMAN LAW OFFICES, LLC

14 /s/ Phoebe V. Redmond  
15 PHOEBE V. REDMOND, ESQ.  
16 Nevada Bar No. 9657  
17 5100 West Sahara Avenue  
18 Las Vegas, Nevada 89146  
*Attorney for Defendant, CCSD*

/s/ Hillary D. Freeman  
HILLARY D. FREEMAN, ESQ.  
N.J. Attorney I.D. No. 002362006  
(Admitted *Pro Hac Vice*)  
103 Carnegie Center, Suite 101  
Princeton, New Jersey 08540  
*Attorneys for Plaintiffs*

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22 **IT IS SO ORDERED.**

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25 \_\_\_\_\_  
26 RICHARD F. BOULWARE, II  
27 UNITED STATES DISTRICT JUDGE

28 DATED this 31st day of August, 2020.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 31<sup>st</sup> day of August, 2020, I filed and served the foregoing **STIPULATION AND ORDER TO EXTEND TIME TO RESPOND TO PLAINTIFFS' MEMORANDUM DETAILING RELIEF SOUGHT, FILED PURSUANT TO ECF No. 73 (First Request)** with the Clerk of the Court using the ECF system which served the parties hereto electronically.

Hillary D. Freeman, Esq.  
Catherine Merino Reisman, Esq.

*Attorneys for Plaintiffs*

/s/ Eva Martinez  
An employee of the Office of the  
General Counsel, CCSD

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