

1 CLARK COUNTY SCHOOL DISTRICT  
 2 OFFICE OF THE GENERAL COUNSEL  
 3 PHOEBE V. REDMOND, ESQ.  
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 6 *Attorney for Defendant, Clark County School District*

7  
 8 **UNITED STATES DISTRICT COURT**  
 9 **DISTRICT OF NEVADA**

10 O.R., BY AND THROUGH HER PARENTS,  
 11 SIG AND LORI ROGICH AND SIG AND  
 12 LORI ROGICH, INDIVIDUALLY,  
 13  
 Plaintiffs,  
 14  
 v.  
 15 CLARK COUNTY SCHOOL DISTRICT,  
 16  
 Defendant.

CASE NO.: 2:17-cv-01541-RFB-NJK  
  
**STIPULATION AND ORDER TO  
 EXTEND TIME TO RESPOND TO  
 PLAINTIFFS’ MOTION FOR  
 ATTORNEY’S FEES AND COSTS**  
  
**[FIRST REQUEST]**

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 18 COMES NOW, Plaintiffs and Defendant Clark County School District (“CCSD”), by and  
 19 through their attorneys of record, and hereby stipulate and agree that the District may have up to  
 20 and including December 10, 2021<sup>1</sup>, to respond to PLAINTIFFS’ MOTION FOR ATTORNEY’S  
 21 FEES AND COSTS (hereinafter referred to as “the Motion”) in this matter. The Motion was  
 22 served on October 25, 2021; therefore, the current response date was November 8, 2021. This is  
 23 the first request for an extension to the response due date.  
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25 This request is being entered for good cause, in good faith, and not for reason of delay.  
 26 The Parties have agreed to engage in settlement of all outstanding claims inclusive of Plaintiffs’  
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28 <sup>1</sup> The day after the District’s Board of Trustee meeting scheduled to authorize final resolution of the current action.

1 attorney's fees and costs. Further, Defendant's counsel was not able to file this request for an  
2 extension for CCSD's response to the Plaintiffs' Motion on or prior to the due date of  
3 November 8, 2021 due to personal illness requiring a doctor's visit.

4 THEREFORE, the parties respectfully request the response due date be extended thirty-  
5 one (31) days up to and including December 10, 2021.

6 DATED this 9<sup>th</sup> day of November, 2021.

7  
8 CLARK COUNTY SCHOOL DISTRICT  
9 OFFICE OF THE GENERAL COUNSEL

FREEMAN LAW OFFICES, LLC

10 By: /s/ Phoebe V. Redmond  
11 PHOEBE V. REDMOND, ESQ.  
12 Nevada Bar No. 9657  
13 5100 West Sahara Avenue  
14 Las Vegas, Nevada 89146  
15 *Attorney for Defendant, CCSD*

By: /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*

16 IT IS SO ORDERED.

17  
18  
19 

20 **RICHARD E. BOULWARE, II**  
21 **United States District Court**

22 DATED this 9th day of November, 2021.