

1 TREVOR J. HATFIELD, ESQ.
 Nevada Bar No. 7373
 2 **HATFIELD & ASSOCIATES, LTD.**
 3 703 South Eighth Street
 Las Vegas, Nevada 89101
 4 (702) 388-4469 Tel.
 (702) 386-9825 Fax
 5 thatfield@hatfieldlawassociates.com

6 Attorney for Plaintiff

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

9 MALINDA SLATON, an individual,
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 Plaintiff,
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 vs.
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 L.L.O. INC., d/b/a ACME ELECTRIC, a domestic
 13 corporation; INTERNATIONAL BROTHERHOOD
 OF ELECTRICAL WORKERS LOCAL UNION
 14 357, a domestic not for profit corporation; DOES I
 through X, inclusive; ROE CORPORATIONS I
 15 through X, inclusive,
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 Defendants.
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CASE NO: 2:17-cv-01561-RFB-DJA

**STIPULATION AND [PROPOSED]
 ORDER TO EXTEND TIME FOR
 PLAINTIFF TO RESPOND TO
 DEFENDANT’S MOTIONS AND FOR
 DEFENDANT TO REPLY**
 (First Request)

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 19 COMES NOW, Plaintiff MALINDA SLATON, (hereinafter, “SLATON”), by and
 20 through her attorney of record Trevor J. Hatfield of the law firm of Hatfield & Associates, Ltd.,
 21 and L.L.O. INC., d/b/a ACME ELECTRIC’s (hereinafter “ACME ELECTRIC) and do hereby
 22 stipulate and agree to an extension of time for Plaintiff to respond to Defendant’s following
 23 Motions as follows:
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- 25 1. Motion for Summary Judgment on Breach of Contract Claim (ECF #51) filed on August 8,
 26 2019 – Response due on August 29, 2019;
- 27 2. Motion for Summary Judgment on Title VII Claim (ECF #52) filed on August 9, 2019 –
 28 Response due on August 30, 2019;

1 3. Third Motion for Partial Summary Judgment to Limit Plaintiff's Categories of Damages
2 (ECF #53) filed on August 12, 2019 – Response due on September 2, 2019;

3 4. Motion to Strike Jury Demand or, in the Alternative, to Bifurcate Liability and Damages
4 Phases of Trial (ECF #54 and ECF #55) filed on August 13, 2019 – Response due on
5 August 27, 2019.
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7 The reason the extension is requested is that Plaintiff's attorney is scheduled for dental
8 surgery on Tuesday, August 27, 2019, and will require one day for recovery. In addition, the Labor
9 Day Holiday weekend is August 31 through September 2, 2019. As responses are required for the
10 Motions, the last one being due on September 2, 2019, the parties have agreed to extend the
11 response time for each of the Motions one week from each of the respective due dates. Defendant's
12 replies to Plaintiff's responses will also be extended by one week respectively.
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14 This request is submitted pursuant to LR IA 6-1, 6-2 and LR II 7-1 and 26-4 and is the
15 parties' first request for an extension of the time for the parties to respond to the various motion
16 response deadlines. Accordingly, Plaintiff's proposed response dates and Defendant's proposed
17 reply dates shall be as follows:

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<u>Document Number</u>	<u>Proposed Response Due Date</u>	<u>Proposed Reply Due Date</u>
1. Motion - ECF #51	September 5, 2019	September 26, 2019
2. Motion – ECF #52	September 6, 2019	September 27, 2019
3. Motion – ECF #53	September 10, 2019	September 30, 2019
4. Motion – ECF #54 and ECF #55	September 3, 2019	September 17, 2019

Dated this 27th day of August 2019.

Dated this 27th day of August 2019.


HATFIELD & ASSOCIATES, LTD.

HOLLEY DRIGGS, WALCH
FINE WRAY PUZEY & THOMPSON

/s/ Trevor J. Hatfield
By: _____
Trevor J. Hatfield, Esq.
Nevada Bar No. 7373
703 S. Eighth St.
Las Vegas, NV 89101
(702) 388-4469 Tel.
Email: thatfield@hatfieldlawassociates.com
Attorney for Plaintiff

/s/ F. Thomas Edwards
By: _____
F. Thomas Edwards, Esq., SBN 9549
400 South Fourth Street, Third Floor
Las Vegas, Nevada 89101
Telephone: 702/791-0308
Email: tedwards@nevadafirm.com
Attorneys for Defendant L.L.O. Inc. d/b/a Acme
Electric

IT IS SO ORDERED.



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED this 28th day of August, 2019.

