1 CLARK COUNTY SCHOOL DISTRICT OFFICE OF THE GENERAL COUNSEL S. SCOTT GREENBERG, ESQ. Nevada Bar No. 4622 5100 W. Sahara Ave. Las Vegas, Nevada 89146 (702) 799-5373 Attorney for Defendant, CLARK COUNTY SCHOOL DISTRICT

6

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

7 8

GARLAND HENDERSON, et al.

CASE NO. 2:17-cv-01767-JAD-NJK

TO

EXTEND

MOTION

9

11

12

Plaintiff,

V

CLARK COUNTY SCHOOL DISTRICT,

JOH DIBINIC

Defendant

DEADLINE
(First Request)

STIPULATION

13 14

15

16

17

18

19

20

21

22

23

25

COME NOW, the parties, by and through their attorneys of record, and hereby stipulate and agree to extend the motion deadline thirty (30) days from the current deadline of March 5, 2018, up to and including April 4, 2018. This is the first request to extend the motion deadline. This request is made in good faith for the

reasons described below and not for any reason of delay.

The parties completed depositions during the last week of the discovery period and are awaiting final transcripts to be prepared. Moreover, counsel spoke in person late last week regarding a potential resolution of the matter. Counsel expect to know whether a resolution is reached within the next 2 weeks and even if a complete resolution is not reached it is believed the discussions will lead to a reduction in the claims asserted by the two

Plaintiffs. The parties request this extension to allow sufficient

1	time for counsel to fully explore the recent proposals and to allow
2	for counsel's receipt of the deposition transcripts. Additionally,
3	defense counsel has motion deadlines in two (2) other federal
4	employment discrimination cases between now and March 14, 2018, he
5	is currently working on summary judgment motions for filing.
6	Therefore, the parties respectfully request that the motion
7	deadline be extended thirty (30) days up to and including April 4,
8	2018.
9	DATED this 7 th day of February, 2018.
10	CLARK COUNTY SCHOOL DISTRICT LAW OFFICES OF ROBERT P. Office of the General Counsel SPRETNAK
11	office of the deficial counsel birdinan
12	
13	By: <u>/s/ S. Scott Greenberg</u> By: <u>/s/ Robert Spretnak</u> S. SCOTT GREENBERG ROBERT SPRETNAK
14	NV Bar No. 4622 NV Bar No. 5135 5100 W. Sahara Ave. 8275 S. Eastern Avenue
15	Las Vegas, NV 89146 Suite 200 Attorneys for Defendant, Las Vegas, NV 89123
16	Clark COUNTY SCHOOL DISTRICT Attorney for Plaintiffs
17	
18	
19	IT IS SO ORDERED:
20	
21	_ February 7, 2018
22	Date: U.S. MAGISTRATE JUDGE
23	
24	
25	
26	
27	

28