

1 CLARK COUNTY SCHOOL DISTRICT
 OFFICE OF THE GENERAL COUNSEL
 2 S. SCOTT GREENBERG, ESQ.
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 4 (702) 799-5373
 Attorney for Defendant,
 5 CLARK COUNTY SCHOOL DISTRICT

6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8
9 GARLAND HENDERSON, et al.

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

10 Plaintiff,

**STIPULATION TO EXTEND MOTION
DEADLINE**

11 v.

(First Request)

12 CLARK COUNTY SCHOOL DISTRICT,

13 Defendant
14

15 COME NOW, the parties, by and through their attorneys of
 16 record, and hereby stipulate and agree to extend the motion deadline
 17 thirty (30) days from the current deadline of March 5, 2018, up to
 18 and including April 4, 2018. This is the first request to extend
 19 the motion deadline. This request is made in good faith for the
 20 reasons described below and not for any reason of delay.

21 The parties completed depositions during the last week of the
 22 discovery period and are awaiting final transcripts to be prepared.
 23 Moreover, counsel spoke in person late last week regarding a
 24 potential resolution of the matter. Counsel expect to know whether
 25 a resolution is reached within the next 2 weeks and even if a
 26 complete resolution is not reached it is believed the discussions
 27 will lead to a reduction in the claims asserted by the two
 28 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 7th day of February, 2018.

10 CLARK COUNTY SCHOOL DISTRICT
11 Office of the General Counsel

LAW OFFICES OF ROBERT P.
SPRETNAK

12
13 By: /s/ S. Scott Greenberg
14 S. SCOTT GREENBERG
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By: /s/ Robert Spretnak
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18
19 **IT IS SO ORDERED:**

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22 Date: February 7, 2018



U.S. MAGISTRATE JUDGE