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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

PATRICIA FITZPATRICK and ROBERT)
L. ANSARA, as Special Co-Administrators)
and Personal Representatives of the Estate)
of JEREMIAH BOWLING, deceased; and)
PATRICIA FITZPATRICK, as Heir and)
Mother of JEREMIAH BOWLING,)
deceased,)

Plaintiffs,
v.

LAS VEGAS METROPOLITAN POLICE)
DEPARTMENT, a political subdivision of)
the State of Nevada; THOMAS STRIEMER,)
Corrections Officer, individually and in his)
official capacity; ANGELO LARRY,)
Corrections Officer, individually and in his)
official capacity; ROLANDO TREVINO,)
Corrections Officer, individually and in his)
official capacity; and NAPHCARE, INC., an)
Alabama corporation,)

Defendants.

Case No.: 2:17-cv-1886-JAD-BNW
**STIPULATION TO CONTINUED
FRCP 30(b)(6) DEPOSITION OF
LAS VEGAS METROPOLITAN
POLICE DEPARTMENT TO
JUNE 19, 2020**

1 COME NOW PLAINTIFFS PATRICIA FITZPATRICK and ROBERT L. ANSARA, by
2 and through their counsel of record, NADINE M. MORTON ESQ. of MORTON LAW, PLLC, and
3 A. J. SHARP, ESQ. of SHARP LAW CENTER, Defendant THOMAS STRIEMER and Third Party
4 LAS VEGAS METROPOLITAN POLICE DEPARTMENT, by and through their counsel of record,
5 ROBERT W. FREEMAN, ESQ. of LEWIS BRISBOIS BISGAARD & SMITH LLP, and Defendant
6 NAPHCARE, INC., by and through its counsel of record, S. BRENT VOGEL, ESQ. of LEWIS
7 BRISBOIS BISGAARD & SMITH LLP (collectively herein, the “Parties”), and Stipulate to conduct
8 the continued deposition of Las Vegas Metropolitan Police Department, pursuant to FRCP 30(b)(6),
9 from Friday, April 3, 2020, to **Friday, June 19, 2020, at 10:00 a.m.**

10 **PROCEDURAL BACKGROUND**

11 On February 14, 2020, this Court granted the Parties’ Stipulation to conduct the continued
12 FRCP 30(b)(6) deposition of Las Vegas Metropolitan Police Department (“LVMPD”) on
13 April 3, 2020. *Docket Filing #132.*

14 However, counsel for LVMPD has represented that, in light of the ongoing
15 coronavirus/COVID-19 pandemic, counsel’s office (the location of the deposition) is undergoing
16 structural changes to enable employees to maintain appropriate distances while working, to avoid
17 the spread of the virus. In addition, counsel would have to meet in-person with Sergeant Albright,
18 LVMPD’s FRCP 30(b)(6) designee, to properly prepare him for the deposition, a potentially
19 extended meeting that is inadvisable under the circumstances.

20 Finally, the Parties agree that conducting this deposition on April 3, 2020 (less than two
21 weeks from now) will likely be untenable under Governor Sisolak’s current Orders, and would in
22 any event be ill-advised, as it requires in-person contact that can readily be avoided.

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1 The Parties therefore have agreed to Stipulate, subject to this Court's approval, to conduct
2 the continued FRCP 30(b)(6) deposition of LVMPD on **Friday, June 19, 2020, at 10:00 a.m.** The
3 Parties further stipulate that, should LVMPD counsel's office be unavailable to host the deposition
4 on that date, the Parties will work together to identify and utilize an alternative location.

5 The Parties aver that good cause exists for the requested stay and that this Stipulation is not
6 submitted for purposes of delay.

7 DATED this 23rd day of March, 2020.

DATED this 23rd day of March, 2020.

8 **MORTON LAW, PLLC**

**LEWIS BRISBOIS BISGAARD &
SMITH**

9 /s/ Nadine M. Morton

/s/ S. Brent Vogel

10 Nadine M. Morton, Esq.
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*Attorneys for Defendant
Naphcare, Inc.*

15 DATED this 23rd day of March, 2020.

16 **LEWIS BRISBOIS BISGAARD
& SMITH**

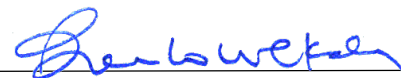
17 /s/ Robert W. Freeman

18 Robert W. Freeman, Jr., Esq.
19 Nevada Bar No. 3062
20 6385 South Rainbow Boulevard
21 Suite 600
22 Las Vegas, Nevada 89118
*Attorneys for Defendant Thomas Striemer
and Third Party Las Vegas Metropolitan
Police Department*

ORDER

24 IT IS SO ORDERED.

25 Dated this 1st day of April, 2020.

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28 UNITED STATES MAGISTRATE JUDGE