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NADINE M. MORTON, ESQ.  
Nevada Bar No. 8583  
**MORTON LAW, PLLC**  
11700 West Charleston Boulevard  
Suite 170-65  
Las Vegas, NV 89135  
Telephone: (702) 718-3000  
Nadine@mortonlawnv.com

A. J. SHARP, ESQ.  
Nevada Bar No. 11457  
**SHARP LAW CENTER**  
11700 West Charleston Boulevard  
Suite 234  
Las Vegas, NV 89135  
Telephone: (702) 250-9111  
ajsharp@sharplawcenter.com

*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 CONTINUE  
FRCP 30(b)(6) DEPOSITION OF  
LAS VEGAS METROPOLITAN  
POLICE DEPARTMENT TO  
SEPTEMBER 11, 2020**  
**[THIRD REQUEST]**

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, June 19, 2020, to **Friday, September 11, 2020, at 10:00 a.m.** Pursuant to Local Rule  
10 IA 6-1(a), the Parties represent that this is the third request for extension of this time, as explained  
11 below.

12 **PROCEDURAL BACKGROUND**

13 On February 14, 2020, this Court granted the Parties’ Stipulation to conduct the continued  
14 FRCP 30(b)(6) deposition of Las Vegas Metropolitan Police Department (“LVMPD”) on  
15 April 3, 2020. *Docket Filing #132*. On April 1, 2020, this Court approved extension of the  
16 continuance through Friday, June 19, 2020, in light of the need for Defense counsel’s office to be  
17 reconfigured to accommodate the ongoing COVID-19 pandemic. *Docket Filing #147*.

18 However, in late May 2020, Defense counsel’s firm imposed a “phased-in reopening” of its  
19 office, such that in-person depositions will not be possible until at least late August. Moreover, in  
20 the interim, Defense counsel learned that LVMPD’s prior FRCP 30(b)(6) designee, Sergeant  
21 Albright, had been reassigned to a different department, and that LVMPD therefore chose to  
22 designate a different individual for the remainder of the deposition. Because of the firm’s  
23 COVID-19 restrictions, Defense counsel will not be permitted to meet in-person with the new  
24 designee to prepare for the deposition until late August.

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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, September 11, 2020, at 10:00 a.m.**  
3 The Parties aver that good cause exists for the requested stay and that this Stipulation is not submitted  
4 for purposes of delay.

5 DATED this 19th day of June, 2020.

DATED this 19th day of June, 2020.

6 **MORTON LAW, PLLC**

**LEWIS BRISBOIS BISGAARD  
& SMITH**

7  
8 /s/ Nadine M. Morton  
9 Nadine M. Morton, Esq.  
10 Nevada Bar No. 8583  
11 11700 West Charleston Blvd.  
12 Suite 170-65  
13 Las Vegas, Nevada 89135  
14 *Attorney for Plaintiffs*

/s/ S. Brent Vogel  
S. Brent Vogel, Esq.  
Nevada Bar No. 6858  
6385 South Rainbow Boulevard  
Suite 600  
Las Vegas, Nevada 89118  
*Attorneys for Defendant  
Naphcare, Inc.*

15 DATED this 19th day of June, 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  
23 *Attorneys for Defendant Thomas Striemer  
and Third Party Las Vegas Metropolitan  
Police Department*

**ORDER**

24 IT IS SO ORDERED.

25 Dated this 22nd day of June, 2020.

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UNITED STATES MAGISTRATE JUDGE