

1 ROBERT W. FREEMAN  
 Nevada Bar No. 3062  
 2 [Robert.Freeman@lewisbrisbois.com](mailto:Robert.Freeman@lewisbrisbois.com)  
 LEWIS BRISBOIS BISGAARD & SMITH LLP  
 3 6385 S. Rainbow Boulevard, Suite 600  
 Las Vegas, Nevada 89118  
 4 702.893.3383  
 FAX: 702.893.3789  
 5 Attorneys for Defendants  
 Las Vegas Metropolitan Police  
 6 Department, Corrections Officer  
 Angelo Larry and Corrections Officer  
 7 Rolando Trevino

8 **UNITED STATES DISTRICT COURT**  
 9 **DISTRICT OF NEVADA, SOUTHERN DIVISION**

10 \*\*\*

11 PATRICIA FITZPATRICK and ROBERT L.  
 ANSARA, as Special Co-Administrators and  
 12 Special Representatives of the Estate of  
 JERREMIAS BOWLING, deceased; and  
 13 PATRICIA FITZPATRICK, as Heir and  
 Mother of JEREMIAH BOWLING, deceased,  
 14  
 Plaintiff,  
 15  
 vs.  
 16

CASE NO. 2:17-cv-1886-JAD-PAL  
**STIPULATION AND ORDER  
 EXTENDING THE DEADLINE FOR THE  
 FILING OF DEFENDANTS LAS VEGAS  
 METROPOLITAN POLICE  
 DEPARTMENT, CORRECTIONS  
 OFFICER ANGELO LARRY AND  
 CORRECTIONS OFFICER ROLANDO  
 TREVINO ANSWER TO PLAINTIFFS'  
 SECOND AMENDED COMPLAINT**

17 LAS VEGAS METROPOLITAN POLICE  
 DEPARTMENT, a political subdivision of the  
 18 State of Nevada; ANGELO LARRY,  
 Corrections Officer, individually and in his  
 19 official capacity; ROLANDO TREVINO,  
 Corrections Officer, individually and in his  
 20 official capacity; DOES 1 through 10,  
 individually and/or in their official capacities;  
 21 DOE CLASSIFICATION OFFICERS I  
 through 10, individually and/or in their official  
 22 capacities; DOE CORRECTIONS OFFICERS  
 I through 10, individually and/or in their  
 23 official capacities; ROE CORPORATIONS I  
 through 10, Foreign and/or Domestic  
 24 Corporations, NAPHCARE, INC., an Alabama  
 corporation qualified to do business in the  
 25 State of Nevada; DOE HEALTH CARE  
 PROVIDERS1 through 10, individually,  
 26  
 Defendants.  
 27

**STIPULATION AND ORDER EXTENDING THE DEADLINE  
FOR THE FILING OF DEFENDANTS LAS VEGAS METROPOLITAN  
POLICE DEPARTMENT, CORRECTIONS OFFICER ANGELO LARRY  
AND CORRECTIONS OFFICER ROLANDO TREVINO'S  
ANSWER TO PLAINTIFFS' SECOND AMENDED COMPLAINT**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

IT IS HEREBY STIPULATED AND AGREED, by and between Robert W. Freeman, Esq. of LEWIS BRISBOIS BISGAARD & SMITH LLP, counsel for Defendants Las Vegas Metropolitan Police Department, Corrections Officer Angelo Larry and Corrections Officer Rolando Trevino and Nadine M. Morton, Esq., of MORTON LAW, PLLC, counsel for Plaintiffs Patricia Fitzpatrick and Robert L. Ansara, as Special Co-Administrators and Special Representatives of the Estate of Jeremiah Bowling, deceased; and Patricia Fitzpatrick, as Heir and Mother of Jeremiah Bowling, that:

The due date for Defendants' Answer to Plaintiffs' Second Amended Complaint (ECF No. 32), be extended from March 12, 2018, to March 19, 2018.

**Reason for the Extension:**

Because of the complexity of the claims made in Plaintiffs' Amended Complaint, Defendants need additional time to perform an investigation prior to filing a responsive pleading.

...  
...  
...  
...  
...  
...  
...  
...  
...  
...  
...  
...  
...  
...  
...  
...  
...

1 This is the first request to extend this deadline, which is made in good faith and not for purposes  
2 of delay.

3 DATED this 12<sup>th</sup> day of March, 2018.

DATED this 12<sup>th</sup> day of March 2018.

4 MORTON LAW, PLLC

LEWIS BRISBOIS BISGAARD & SMITH

5  
6 /s/ Nadine M. Morton

/s/ Robert W. Freeman

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

Robert W. Freeman, Jr., Esq.  
Nevada Bar No. 3062  
6385 S. Rainbow Blvd., Suite 600  
Las Vegas, Nevada 89118  
*Attorneys for Defendants*

10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

IT IS SO ORDERED:

  
UNITED STATES MAGISTRATE JUDGE

DATED: March 13, 2018