

1 TREVOR J. HATFIELD, ESQ  
 Nevada Bar No. 7373  
 2 HATFIELD & ASSOCIATES, LTD.  
 703 S. Eighth Street  
 3 Las Vegas, Nevada 89101  
 Telephone: (702) 388-4469  
 4 Facsimile: (702) 386-9825  
 5 Email: [thatfield@hatfieldlawassociates.com](mailto:thatfield@hatfieldlawassociates.com)  
 Attorney for Plaintiff In conjunction with Legal Aid  
 6 Center of Southern Nevada Pro Bono Project

7  
 8 **UNITED STATES DISTRICT COURT**  
 9 **DISTRICT OF NEVADA**

10 JUSTIN L. TRIPP,  
 11 Plaintiff,  
 12 vs.  
 13 CLARK COUNTY, et al  
 14 Defendants.

CASE NO: 2:17-cv-01964-JCM-BNW

**STIPULATION AND ORDER TO  
 EXTEND TIME FOR PLAINTIFF TO  
 RESPOND TO DEFENDANTS' FOUR  
 MOTIONS FOR SUMMARY  
 JUDGMENT  
 (First Request)**

15 COMES NOW, Plaintiff Justin Tripp ("Plaintiff"), by and through his counsel, the law  
 16 firm of Hatfield & Associates., Ltd., appearing *pro bono publico*, and Defendant Cesar Esparza,  
 17 Defendant Las Vegas Metropolitan Police Department, Defendants Michael Rose and Jacquelyn  
 18 Schumaker and Defendants LVMPD Sergeants' (hereinafter "Defendants") by and through their  
 19 counsel, the law firm of Kaempfer Crowell, hereby stipulate and agree to extend the time for  
 20 Plaintiff to Respond to the following Defendants' Motions for Summary Judgment, due on May  
 21 17, 2021, to July 16, 2021:  
 22

- 24 1. Defendant Cesar Esparza's Motion for Summary Judgment [ECF #198];  
 25 2. Defendant Las Vegas Metropolitan Police Department's Motion for Summary Judgment  
 26 [ECF #199];  
 27 3. Defendants Michael Rose's and Jacquelyn Schumaker's Motion for Summary Judgment  
 28 [ECF #200];

4. Defendants' LVMPD Sergeants' Motion for Summary Judgment [ECF #201].

This request is submitted pursuant to LR IA 6-1, 6-2 and 7-1 and is the parties' first request for an extension of time for Plaintiff to respond to Defendant's Motion for Summary Judgment.

Good cause exists for this extension. Plaintiff's counsel is requesting a sixty (60) day extension of time up to and including July 16, 2021, to respond to all parties' Motions for Summary Judgment as Plaintiff is in prison, communication must be scheduled, and the volume of the motions. Defendant has courteously granted this extension of time for Plaintiff to file his Response. Accordingly, Plaintiff shall have up to and including July 16, 2021, to respond to Defendants' Motions for Summary Judgment [ECF #198], [ECF #199], [ECF #200] and [ECF #201].

DATED this 11<sup>th</sup> day of May, 2021

DATED this 11<sup>th</sup> day of May, 2021

**HATFIELD & ASSOCIATES**

**KAEMPFER CROWELL**

*/s/ Trevor J. Hatfield*  
By: TREVOR J. HATFIELD, ESQ. (SBN 7373)  
703 S. Eighth Street  
Las Vegas, Nevada 89101  
Tel: (702) 388-4469  
Email: [thatfield@hatfieldlawassociates.com](mailto:thatfield@hatfieldlawassociates.com)  
*Attorney for Plaintiff In Conjunction with  
Legal Aid Center of Southern Nevada Pro  
Bono Project.*

*/s/ Lyssa S. Anderson*  
By: LYSSA S. ANDERSON, ESQ. (SBN 5781)  
RYAN W. DANIELS, ESQ. (SBN 13094)  
1980 Festival Plaza Drive, Ste. 650  
Las Vegas, Nevada 89135  
Tel: (702) 792-7000  
Email: [landerson@kcnvlaw.com](mailto:landerson@kcnvlaw.com)  
Email: [rdaniels@kcnvlaw.com](mailto:rdaniels@kcnvlaw.com)  
*Attorneys for Defendant Cesar Esparza*

///

///

///

///

///

HATFIELD & ASSOCIATES, LTD.  
703 8<sup>th</sup> Street \* Las Vegas, Nevada 89101  
Telephone (702) 388-4469

1 DATED this 11<sup>th</sup> day of May, 2021.

2 **LAURIA TOKUNAGA GATES & LINN, LLP**

3 */s/ Paul A. Cardinale*

4 By: \_\_\_\_\_  
5 PAUL A. CARDINALE, ESQ. (SBN 8394)  
6 1755 Creekside Oaks Drive, Suite 240  
7 Sacramento, CA 95833  
8 Tel.: (916) 492-2000  
9 Email: [pcardinale@ltglaw.net](mailto:pcardinale@ltglaw.net)


10 **Southern Nevada Office:**

11 601 South Seventh Street  
12 Las Vegas, NV 89101  
13 Tel.: (702) 387-8633

14 *Attorneys for NAPHCARE, INC., an Alabama Corporation; HARRY DURAN, M.D., in his*  
15 *individual capacity; ERIC LOPEZ, P.A., in his individual capacity; RACHEL SCHEIBLICH*  
16 *(formerly known as "RUDD") in her individual capacity; KENDRA MEYER (formerly known as*  
17 *SCHULTZ") in her individual capacity, and RAYMOND MONDORA*

18 **ORDER**

19 **IT IS SO ORDERED:**

20   
21 \_\_\_\_\_  
22 UNITED STATES DISTRICT COURT JUDGE

23 Dated: May 13, 2021  
24 \_\_\_\_\_

HATFIELD & ASSOCIATES, LTD.  
703 8<sup>th</sup> Street \* Las Vegas, Nevada 89101  
Telephone (702) 388-4469