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 6 Center of Southern Nevada Pro Bono Project

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 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 LVMPD DEFENDANTS'  
 MOTIONS FOR SUMMARY  
 JUDGMENT  
 (Fourth 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 "LVMPD Defendants") by and  
 19 through their counsel, the law firm of Kaempfer Crowell, hereby stipulate and agree to extend  
 20 the time for Plaintiff to Respond to the following Defendants' Motions for Summary Judgment,  
 21 due on December 13, 2021, to February 11, 2022:

- 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];

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

2 This request is submitted pursuant to LR IA 6-1, 6-2 and 7-1 and is the parties' fourth  
3 request for an extension of time for Plaintiff to respond to Defendants' Motions for Summary  
4 Judgment.

5 Good cause exists for this extension. Plaintiff's counsel is requesting a sixty (60) day  
6 extension of time up to and including February 11, 2022, to respond to all parties' Motions for  
7 Summary Judgment as Plaintiff is incarcerated, communication must be scheduled, and the  
8 volume of the motions. Plaintiff informed his counsel in July 2021 that he was being transferred  
9 to another Federal Prison but did not know when he would arrive and where he would be  
10 residing at that time. Plaintiff has been transported to several Federal Prison's since July 2021,  
11 each time having to deal with a twenty-one (21) day quarantine. Our office was informed by  
12 Plaintiff on Friday, December 10, 2021, that he had arrived at his final destination approximately  
13 two weeks ago and was just released from quarantine.

14 In addition, Plaintiff was not permitted to take his legal documents with him in transit.  
15 Therefore, Plaintiff's counsel shall have to forward all the legal documents to his new prison  
16 location.

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1 Defendants have courteously granted this extension of time for Plaintiff to file his  
2 Responses. Accordingly, Plaintiff shall have up to and including February 11, 2022, to respond  
3 to Defendants' Motions for Summary Judgment [ECF #198], [ECF #199], [ECF #200] and [ECF  
4 #201].

5 DATED this 13<sup>th</sup> day of Decemer, 2021

DATED this 13<sup>th</sup> day of December, 2021

6 **HATFIELD & ASSOCIATES**

**KAEMPFER CROWELL**

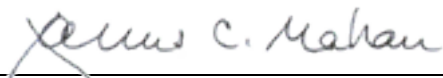
7  
8 */s/ Trevor J. Hatfield*  
9 By: \_\_\_\_\_  
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15 *Attorney for Plaintiff In Conjunction with*  
16 *Legal Aid Center of Southern Nevada Pro*  
17 *Bono Project.*

*/s/ Lyssa A. Anderson*  
By: \_\_\_\_\_  
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*Attorneys for Defendants Cesar Esparza,*  
*Michael Rose, Jacquelyn Schumaker, LVMPD*  
*Sergeants.*

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21 **ORDER**

22 **IT IS SO ORDERED:**

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24 \_\_\_\_\_  
UNITED STATES DISTRICT COURT JUDGE

25 Dated: December 15, 2021  
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