8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

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

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JUSTIN L. TRIPP,

Plaintiff,

vs.

CLARK COUNTY, et al

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 (Fifth Request)

COMES NOW, Plaintiff Justin Tripp ("Plaintiff"), by and through his counsel, the law firm of Hatfield & Associates., Ltd., appearing *pro bono publico*, and Defendant Cesar Esparza, Defendant Las Vegas Metropolitan Police Department, Defendants Michael Rose and Jacqulyn Schumaker and Defendants LVMPD Sergeants' (hereinafter "LVMPD Defendants") by and through their counsel, the law firm of Kaempfer Crowell, and hereby stipulate and agree to extend the time for Plaintiff to Respond to the following Defendants' Motions for Summary Judgment, due on February 11, 2022, to March 14, 2022:

- 1. Defendant Cesar Esparza's Motion for Summary Judgment [ECF #198];
- 2. Defendant Las Vegas Metropolitan Police Department's Motion for Summary Judgment [ECF #199];
- 3. Defendants Michael Rose's and Jacqulyn Schumaker's Motion for Summary Judgment [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' fifth request for an extension of time for Plaintiff to respond to Defendants' Motions for Summary Judgment.

Good cause exists for this extension. Plaintiff's counsel is requesting a thirty (30) day extension of time up to and including March 14, 2022 (as the thirtieth day is a Sunday), to respond to all parties' Motions for Summary Judgment as Plaintiff is incarcerated, communication must be scheduled, and the volume of the motions. Plaintiff was not permitted to take his legal documents with him in transit. Therefore, Plaintiff's counsel had to mail his legal documents to his new prison location. In addition, Plaintiff's counsel's staff was absent for nearly one month's time due to contracting Covid-19 and has only recently been back to work.

/// ///

///

///

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

20

/// 19

///

21 ///

22 /// 23

/// 24

/// 25 ///

27 ///

26

28 ///

Defendants have courteously granted this extension of time for Plaintiff to file his Responses. Accordingly, Plaintiff shall have up to and including March 14, 2022, to respond to 2 3 Defendants' Motions for Summary Judgment [ECF #198], [ECF #199], [ECF #200] and [ECF 4 #201]. 5 DATED this 11th day of February, 2022 DATED this 11th day of February, 2022 6 HATFIELD & ASSOCIATES **KAEMPFER CROWELL** /s/ Trevor J. Hatfield /s/ Lyssa S. Anderson 8 By: By: TREVOR J. HATFIELD, ESQ. (SBN 7373) LYSSA S. ANDERSON, ESQ. (SBN 5781) 9 703 S. Eighth Street RYAN W. DANIELS, ESQ. (SBN 13094) Las Vegas, Nevada 89101 1980 Festival Plaza Drive, Ste. 650 10 Tel: (702) 388-4469 Las Vegas, Nevada 89135 Email: thatfield@hatfieldlawassociates.com 11 Tel: (702) 792-7000 Attorney for Plaintiff In Conjunction with Email: landerson@kcnvlaw.com Legal Aid Center of Southern Nevada Pro 12 Email: rdaniels@kcnvlaw.com Bono Project. Attorneys for Defendants Cesar Esparza, 13 Michael Rose, Jacqulyn Schumaker, 14 LVMPD Sergeants. 15 16 17 18 **ORDER** 19 20 IT IS SO ORDERED: 21 UNITED STATES DISTRICT COURT JUDGE 22 February 11, 2022 23 Dated: 24 25 26 27 28