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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

AMENDED STIPULATION AND ORDER TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO 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 Defendant NaphCare, Inc., Defendant Harry Duran, M.D., Defendant Eric Lopez, P.A., Defendant Rachel Scheiblich, Defendant Kendra Meyer, and Defendant Raymond Mondora, (hereinafter "NaphCare Defendants"), by and through their counsel, the law firm of Lauria Tokunaga Gates & Linn, LLP, 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];

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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].
- 5. NaphCare Defendants' Motion for Summary Judgment [ECF #197].

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.

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 ///

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1	to Defendants' Motions for Summary Judgment [ECF #197], [ECF #198], [ECF #199], [ECF								
2	#200] and [ECF #201].								
3	DATED this 11th day of February, 2022	DATED this 11th day of February, 2022							
4	HATFIELD & ASSOCIATES	KAEMPFER CROWELL							
5	By: /s/ Trevor J. Hatfield	By: /s/ Lyssa S. Anderson							
6	TREVOR J. HATFIELD, ESQ. (SBN 7373) 703 S. Eighth Street Las Vegas, Nevada 89101	LYSSA S. ANDERSON, ESQ. (SBN 5781) RYAN W. DANIELS, ESQ. (SBN 13094)							
7 8	Email: thatfield@hatfieldlawassociates.com Attorney for Plaintiff In Conjunction with	1980 Festival Plaza Drive, Ste. 650 Las Vegas, Nevada 89135							
9	Legal Aid Center of Southern Nevada Pro Bono Project.	Email: <a href="mailto:landerson@kcnvlaw.com">landerson@kcnvlaw.com</a> Email: <a href="mailto:rdaniels@kcnvlaw.com">rdaniels@kcnvlaw.com</a>							
10	<b>,</b>	Attorneys for Defendants Cesar Esparza, Michael Rose, Jacqulyn Schumaker,							
11		LVMPD Sergeants.							
12	DATED this 11 <sup>th</sup> day of February, 2022								
13									
14	LAURIA TOKUNAGA GATES & LINN, LLP								
15	By: /s/ Paul A. Cardinale PAUL A. CARDINALE, ESQ. (SBN 8394)								
16	1755 Creekside Oaks Drive, Suite 240 Sacramento, CA 95833								
17	Email: pcardinale@ltglaw.net Southern Nevada Office:								
18 19	601 South Seventh Street								
20	Las Vegas, NV 89101 Tel.: (702) 387-8633								
21	Attorneys for NAPHCARE, INC., an Alabama Corporation; HARRY DURAN, M.D., in his individual capacity; ERIC LOPEZ, P.A., in his individual capacity; RACHEL SCHEIBLICH								
22	(formerly known as "RUDD") in her individual capacity; KENDRA MEYER (formerly known as SCHULTZ") in her individual capacity, and RAYMOND MONDORA								
23									
24									
25	<u>ORDER</u>								
26		â 1: [·							
27		W C. Mahan							
28	UNITED STATES DISTRICT COURT JUDGE Dated:_February 14, 2022								