

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

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 12  
 13 UNITED STATES DISTRICT COURT  
 14 DISTRICT OF NEVADA

15 JUSTIN L. TRIPP,

16 Plaintiff,

17 vs.

18 CLARK COUNTY, et al

19 Defendants.

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

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**STIPULATION AND ORDER TO  
 EXTEND TIME FOR PLAINTIFF TO  
 RESPOND TO NAPHCARE  
 DEFENDANTS' MOTION FOR  
 SUMMARY JUDGMENT (ECF #244)  
 (Third Request)**

29 COMES NOW, Plaintiff Justin Tripp ("Plaintiff"), by and through his counsel, the law  
 30 firm of Hatfield & Associates., Ltd., appearing *pro bono publico*, and Defendant NaphCare, Inc.,  
 31 Defendant Harry Duran, M.D., Defendant Eric Lopez, P.A., Defendant Rachel Scheiblich,  
 32 Defendant Kendra Meyer, and Defendant Raymond Mondora, (hereinafter "NaphCare  
 33 Defendants"), by and through their counsel, the law firm of Medical Defense Law Group, and  
 34 hereby stipulate and agree to extend the time for Plaintiff to Respond to the NaphCare  
 35 Defendants' Motion for Summary Judgment [ECF #244], due on November 18, 2022 to  
 36 December 2, 2022.

37 This request is submitted pursuant to LR IA 6-1, 6-2 and 7-1 and is the parties' third  
 38 request for an extension of time for Plaintiff to respond to Defendants' Motion for Summary  
 39 Judgment.

1 Good cause exists for this extension. Plaintiff is incarcerated in F.C.I. Herlong, in Herlong,  
2 California and Plaintiff's Counsel has had difficulty communicating with him. Plaintiff's counsel is  
3 requesting an extension of time up to and including December 2, 2022, as Plaintiff requested  
4 authority from his incarcerated client to make an offer to resolve this case to Defendants and  
5 received that authority and made the offer to Defendants' counsel on October 19, 2022.  
6 Defendants responded to the offer on October 25, 2022 with a counteroffer that Plaintiff's  
7 counsel needs to convey to Plaintiff.  
8

9 Plaintiff's counsel continues to have difficulty communicating with Plaintiff as F.C.I.  
10 Herlong is experiencing a Level 3 Lockdown due to Covid. Inmates are not able to take phone  
11 calls or have access to a computer during the lockdown. If Defendants' offer is accepted, the  
12 case would then resolve in the entirety whereby the motion may be made moot, but time is  
13 needed to convey the counteroffer to Plaintiff.  
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Defendants have courteously granted this extension of time for Plaintiff to file his Response. Accordingly, Plaintiff shall have up to and including December 2, 2022, to respond to NaphCare Defendants' Motion for Summary Judgment [ECF #244].

DATED this 17<sup>th</sup> day of November, 2022

DATED this 17<sup>th</sup> day of November, 2022

**HATFIELD & ASSOCIATES, LTD.**

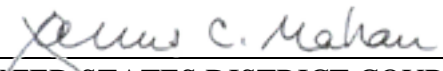
**MEDICAL DEFENSE LAW GROUP**

By: /s/ Trevor J. Hatfield  
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.*

By: Paul A. Cardinale  
PAUL A. CARDINALE, ESQ. (SBN 8394)  
3800 Watt Avenue, Suite 245  
Sacramento, California 95821  
Tel.: (916) 244-9116  
Email: [paul.cardinale@med-defense.com](mailto:paul.cardinale@med-defense.com)  
**Southern Nevada Office:**  
2965 South Jones Blvd., Suite E1  
Las Vegas, NV 89146  
Tel.: (702) 342-8116  
*Attorneys for NAPHCARE Defendants*

**ORDER**

**IT IS SO ORDERED:**

  
UNITED STATES DISTRICT COURT JUDGE

Dated: November 18, 2022