

1 JAMES P. KEMP, ESQUIRE
 Nevada Bar No. 006375
 2 KEMP & KEMP, ATTORNEYS AT LAW
 7435 W. Azure Drive, Suite 110,
 3 Las Vegas, NV 89130
 4 (702) 258-1183 tel./ (702) 258-6983 fax
jp@kemp-attorneys.com
 5 Attorney for Plaintiff Thomas Mooney

6 **UNITED STATES DISTRICT COURT**
 7 **DISTRICT OF NEVADA**

9 THOMAS MOONEY,
 10
 11 Plaintiff,
 12 v.
 13 FIFE DERMATOLOGY, PC, d/b/a
 14 SURGICAL DERMATOLOGY & LASER
 CENTER; DOUGLAS FIFE, M.D.; and
 15 HEATHER FIFE,
 16 Defendants.

CASE NO. 2:17-cv-02191-JCM-DJA

**STIPULATION AND ORDER TO
 EXTEND TIME FOR PLAINTIFF TO
 RESPOND TO DEFENDANTS' MOTION
 FOR SUMMARY JUDGMENT**

(First Request)

KEMP & KEMP
 ATTORNEYS AT LAW
 7435 W. Azure Drive, Suite 110
 LAS VEGAS, NEVADA 89130
 Tel. (702) 258-1183 • Fax (702) 258-6983

18 The parties, by and through their respective counsel, hereby stipulate to extend the time
 19 for Plaintiff to respond to Defendants' MOTION FOR SUMMARY JUDGMENT OPPOSITION
 20 TO PLAINTIFF'S MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT
 21 (ECF No. 71) from the current due date of Friday, March 4, 2022 through and including
 22 **Monday, March 28, 2022.**

23 This is the first request for an extension of this deadline. The parties provide the
 24 following information to the Court regarding the proposed extension of time:
 25

- 26 1. Plaintiff's counsel has been delayed in completing work over the past
 27 several weeks due to a busy litigation calendar. Plaintiff's counsel was out
 28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

of state when the Motion was filed and did not return until February 14, 2022. On February 14, 2022 Plaintiff’s counsel had oral argument before the Ninth Circuit Court of Appeals. That same day after that argument Plaintiff’s counsel travelled to Elko, Nevada for six (6) depositions over three days from February 15-17, 2022. The following week was a short week due to President’s Day. Plaintiff’s counsel had an important deadline on February 22 in a discovery dispute before Magistrate Judge Denney and an all day mediation to prepare for and attend on February 24 with Retired Magistrate Judge Leen. Plaintiff’s counsel then had to travel to Reno for an all day deposition on March 1 and all day depositions in Elko on March 2 and 3.

2. Plaintiff’s counsel also will be leaving on March 4, 2022 for a long-planned two week cruise vacation where he and his wife are celebrating their 25th wedding anniversary. Plaintiff’s counsel will have no time to work on the response to Defendants’ comprehensive motion seeking summary judgment on all claims until at least March 21, 2022. That is why an extension to March 28, 2022 is being sought.
3. The Parties have further agreed to an extension to the Reply deadline for Defendants to April 18, 2022.
4. There are no other deadlines or proceedings with which this extension would interfere.

///
///

1 This stipulation to extend the Response and Reply deadlines on Defendants' Motion for
2 Summary Judgment is made in good faith and not for purposes of delay.
3

4 DATED this 3rd day of March, 2022.

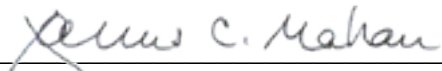
DATED this 3rd day of March, 2022.

7 /s/ Hayley Cummings
8 P. SWEN PRIOR, ESQ.
9 HAYLEY CUMMINGS, ESQ,
10 SNELL & WILMER
11 3883 Howard Hughes Pkwy., #1100
12 Las Vegas, NV 89169
13 Attorney for Defendants

/s/ James P. Kemp
JAMES P. KEMP, ESQ.
Bar No. 6375
KEMP & KEMP, Attorneys at Law
7435 W. Azure Drive, Suite 110
Las Vegas, NV 89130
Attorney for Plaintiff

14 **ORDER**

15 IT IS SO ORDERED:

16 
17 _____
18 UNITED STATES DISTRICT JUDGE

19 DATED: March 4, 2022
20 _____
21
22
23
24
25
26
27
28

KEMP & KEMP
ATTORNEYS AT LAW
7435 W. Azure Drive, Suite 110
LAS VEGAS, NEVADA 89130
Tel. (702) 258-1183 • Fax (702) 258-6983