

CAMPBELL & WILLIAMS  
ATTORNEYS AT LAW  
700 SOUTH SEVENTH STREET, LAS VEGAS, NEVADA 89101  
Phone: 702.382.5222 • Fax: 702.382.0540  
www.campbellandwilliams.com

1 CAMPBELL & WILLIAMS  
DONALD J. CAMPBELL, ESQ. (1216)  
2 [djc@cwlawlv.com](mailto:djc@cwlawlv.com)  
3 SAMUEL R. MIRKOVICH, ESQ. (11662)  
[srm@cwlawlv.com](mailto:srm@cwlawlv.com)  
4 700 South Seventh Street  
Las Vegas, Nevada 89101  
5 Tel: (702) 382-5222  
Fax: (702) 382-0540  
6

7 *Attorneys for Plaintiff*

8 UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10 JOEL LUBRITZ )

11 Plaintiff, )

12 vs. )

13 AIG CLAIMS, INC., a Delaware  
14 Corporation; DOES I through X,  
15 inclusive; ROE CORPORATIONS I through  
16 X, inclusive; ROE LIMITED LIABILITY  
COMPANIES I through X, inclusive, )

17 Defendant. )

) Case No.: 2:17-cv-02310-APG-NJK

) **STIPULATION AND**  
) **ORDER RE: EXTENSION OF TIME**  
) **FOR PLAINTIFF TO FILE OPPOSITION**  
) **TO DEFENDANT AIG CLAIMS, INC.’S**  
) **MOTION FOR SUMMARY JUDGMENT**  
) **[ECF NO 24]**  
) **[FIRST REQUEST FOR EXTENSION]**

18  
19 Pursuant to Local Rules IA 6-1 and 6-2, Plaintiff Joel Lubritz (“Plaintiff”), and Defendant  
20 AIG Claims, Inc. (“Defendant”) hereby stipulate to extend the time for Plaintiff to file his  
21 Opposition to Defendant AIG Claims, Inc.’s Motion for Summary Judgment [ECF No. 24].

22 On March 30, 2018, Defendant filed its Motion for Summary Judgment [ECF No. 24].  
23 Plaintiff’s Opposition is scheduled to be due on Friday, April 20, 2018 but, because Plaintiff’s  
24 counsel is scheduled to begin voir dire in the matter of *Elaine P. Wynn v. Stephen A. Wynn et al.*,  
25 Case No. A-12-656710-C, Plaintiff’s counsel respectfully requests a ten (10) day extension in  
26 which to file the Opposition. Plaintiff submits that good cause exists to approve this stipulation  
27 because of his counsel’s current trial schedule and, moreover, because the Parties are currently  
28

1 scheduled to argue Plaintiff's Motion to Compel the Production of An Unredacted Copy of  
2 Defendant's Claims Notes Pursuant to FRE 612 [ECF No. 18] on April 16, 2018 at 2:00 p.m. Thus,  
3 the instant stipulation will allow Plaintiff's Motion to Compel to be resolved and, if necessary,  
4 additional discovery documents to be produced before Plaintiff's Opposition would be due so that  
5 Plaintiff would not need to seek relief pursuant to FRCP 56(f). Finally, granting this extension will  
6 not require the Court to alter any hearing date on Defendant's Motion for Summary Judgment as no  
7 such hearing date has been set.

9 Based on the foregoing, the Parties hereby stipulate and request that the Court issue an  
10 Order extending the deadline for Plaintiff to file his Opposition to Defendant's Motion for  
11 Summary Judgment [ECF No. 24] by no later than April 30, 2018.

12 IT IS SO STIPULATED.

13 DATED: April 16, 2018

TYSON & MENDES LLP

14 By /s/ Carrie McCrea Hanlon  
15 Carrie McCrea Hanlon, Esq. (3902)  
16 3960 Howard Hughes Parkway, Suite 600  
17 Las Vegas, Nevada 89169  
Attorneys for Defendant AIG Claims, Inc.

18 DATED: April 16, 2018

CAMPBELL AND WILLIAMS

19 By /s/ Samuel R. Mirkovich  
20 Donald J. Campbell, Esq. (1216)  
21 Samuel R. Mirkovich, Esq. (11662)  
22 700 South Seventh Street  
23 Las Vegas, Nevada 89101  
24 Attorneys for Plaintiff

25 **ORDER**

26 Based on the Stipulation between Plaintiff and Defendant [ECF No. 25], which I treat as a  
27 joint motion under LR 6-1(a), **IT IS SO ORDERED.**

28  4/16/2018  
UNITED STATES DISTRICT JUDGE