

1 **JOEL F. HANSEN, ESQ.**
 Nevada Bar No. 1876
 2 **COOPER LEVENSON, P.A.**
 1835 Village Center Circle
 3 Las Vegas, NV 89134
 (702) 366-1125: office
 4 (702) 366-1857: facsimile
jjhansen@cooperlevenson.com
 5 Attorney for Plaintiff

6
 7 **UNITED STATES DISTRICT COURT**
 8 **CLARK COUNTY, NEVADA**

9 HELEN ARMSTRONG

Case No.: 2:17-cv-02528

10 Plaintiff,

11 v.

12 TERRY REYNOLDS, in his individual capacity
 13 and as Deputy Director of Nevada division of
 Business and Industry; STEVE GEORGE, in his
 14 individual capacity and as an administrator of the
 Nevada Division of Industrial Relations; JESS
 15 LANKFORD, in his individual capacity and as
 Chief Administrative Officer of Nevada OSHA;
 16 and LARA PELLEGRINI, in her individual
 17 capacity and as Whistleblower Chief Investigator
 of Nevada OSHA, DOES I through X, unknown
 18 individuals, and ROES XI through XX, entities,
 19 government agencies, corporations, or other
 companies and/or businesses currently unknown;

STIPULATION AND ORDER TO
CONTINUE DATE TO RESPOND TO
ANY MOTIONS FILED ON
NOVEMBER 16, 2017 OR SHORTLY
THEREAFTER BY ANY OF THE
DEFENDANTS
(First Request)

20
 21 Defendants.

22 IT IS HEREBY STIPULATED AND AGREED between Defendants TERRY REYNOLDS,
 23 Deputy Director of Nevada division of Business and Industry; STEVE GEORGE, Administrator of
 24 the Nevada Division of Industrial Relations; JESS LANKFORD, Chief Administrative Officer of
 25 Nevada OSHA; and LARA PELLEGRINI, Whistleblower Chief Investigator of Nevada OSHA, by
 26 and through their counsel, Adam Paul Laxalt, Attorney General, and Deputy Attorney General
 27 Vivienne Rakowsky, and Plaintiff HELEN ARMSTRONG, by and through her counsel, Joel F.

1 Hansen of Cooper Levenson, P.A., that due to the fact that the Plaintiff's attorney, Joel F. Hansen,
2 Esq., will be having back surgery on November 16, 2017 and will be recuperating for an unknown
3 period of time, that the parties stipulate that should the Defendants file any motions in response to
4 the Complaint of the Plaintiff, that the Plaintiff's attorney, Joel F. Hansen, Esq., shall have until
5 January 5, 2018, to respond.
6

7 Good cause exists to continue the date for the Plaintiff to respond to any motions which are
8 filed in response to the Complaint due to the upcoming surgery of counsel for the Plaintiff and this is
9 why the stipulation is entered into this 9th day of November, 2017.

10 COOPER LEVENSON, P.A.

ADAM PAUL LAXALT, Attorney General

11 /s/ Joel F. Hansen

/s/ Vivienne Rakowsky

12 _____
13 JOEL F. HANSEN, ESQ.
14 Nevada Bar No. 1876
15 1835 Village Center Circle
Las Vegas, NV 89134
Attorneys for Plaintiff

12 _____
13 VIVIENNE RAKOWSKY, DAG
14 Nevada Bar No. 9160
15 555 E. Washington Ave., Ste. 3900
Las Vegas, NV 89101
Attorneys for Defendants

16 **ORDER**

17 IT IS SO ORDERD.

18 Dated: November 9, 2017.

19 
20 _____
21 UNITED STATES DISTRICT COURT JUDGE
22
23
24
25
26
27
28