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

10 PAMELA DITTMAR,
 11 Plaintiff,

12 v.

13 CITY OF NORTH LAS VEGAS, a municipal
 14 corporation,
 15 Defendant.

Case No. 2:17-cv-02916-JAD-BNW

STIPULATION AND ORDER FOR
EXTENSIONS OF JOINT
PRETRIAL ORDER DEADLINE

[ECF Nos. 125, 126]

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 17 NOW COMES the Plaintiff, Pamela Dittmar, by and through her attorneys, Melanie A.
 18 Hill and Melanie Hill Law PLLC, and Defendant, City of North Las Vegas, by and through its
 19 attorneys, R. Todd Creer, Kaitlin H. Paxton, and Kamer Zucker Abbott, who hereby stipulate that
 20 the deadline for the parties to file their Joint Pretrial Order be extended from the current requested
 21 extended deadline of October 19, 2022 up to and including October 26, 2022 pursuant to Local Rule
 22 IA 6-1 and Local Rule 26-3.

23 This is the fourth request for an extension of the Joint Pretrial Order deadline and requests an
 24 additional week to finalize the final draft of the Joint Pretrial Order. The first request was by
 25 stipulation to extend the Joint Pretrial Order deadline six weeks to allow the parties time to attend to
 26 prescheduled commitments given that the case did not resolve at the settlement conference. The
 27 second request was by stipulation to extend the Joint Pretrial Order deadline to allow sufficient time
 28 to meet and confer and finalize the Joint Pretrial Order. The third and fourth requests are to allow

1 the parties to further revise the final version after numerous meet and confer conferences over the
2 last thirty days. The parties have circulated multiple drafts and redlines, however the parties need an
3 additional week to review each other's final redlines, finalize the list of exhibits that the parties will
4 mark as Joint Exhibits, and file the final Joint Pretrial Order. This was delayed because after filing
5 the third extension request stipulation, plaintiff's counsel's daughter got sick and has been out of
6 school for the last two days and counsel has been out of work caring for her. In support of this
7 Stipulation and Request, the parties state as follows:

- 8 1. The Court's Order of February 24, 2022 stayed the deadline to file the Pretrial Order for ten
9 (10) days following the mandatory settlement conference. [ECF No. 116].
- 10 2. The mandatory settlement conference was held on July 25, 2022 and the case did not resolve.
11 Accordingly, the deadline for the Joint Pretrial Order was August 4, 2022.
- 12 3. The parties stipulated to extend the Joint Pretrial Order deadline six weeks due to counsel for
13 Defendant's pre-scheduled commitments, including out-of-town travel, rendering them
14 unavailable to sufficiently confer with Plaintiff's counsel to prepare the Joint Pretrial Order
15 by the current deadline. The stipulation was a little longer to account for Plaintiff's counsel's
16 out-of-town travel plans in September for the Labor Day holiday.
- 17 4. Counsel for Plaintiff was brought in at the last minute to assist in a two-week federal trial in
18 late August that delayed Plaintiff's completion of the Joint Pretrial Order and meet and
19 confer. Further, Counsel for Defendant have had to attend multiple hearings scheduled with
20 short notice, one of which required immediate briefing, in addition to tending to a family
21 emergency. Therefore, due to Plaintiff's counsel's schedule in late August and Defendant's
22 counsel's schedule over the past few weeks, the parties also need additional time to meet and
23 confer about issues in the Joint Pretrial Order and issues subject to motions in limine.
- 24 5. Thus, the parties sought a thirty (30) day extension of time, up to and including October 17,
25 2022, to submit their Joint Pretrial Order.
- 26 6. The parties have met and conferred multiple times over the last thirty days and circulated
27 multiple drafts and redlines, however the parties need an additional week from the last
28 requested extension to review each other's final redlines and file the Joint Pretrial Order.

1 7. The parties filed a third stipulation on Monday, October 17, 2022 that has not yet been
2 granted and are filing this fourth stipulation requesting a further week extension to allow
3 additional time to create a joint Exhibit List or exhibits the parties have agreed should be
4 admitted. The parties have circulated multiple drafts and redlines, however the parties need
5 an additional week to review each other's final redlines, finalize the list of exhibits that the
6 parties with mark as Joint Exhibits, and file the final Joint Pretrial Order. This was delayed
7 because after filing the third extension request stipulation, plaintiff's counsel's daughter got
8 sick and has been out of school for the last two days and counsel has been out of work caring
9 for her.

10 8. This request for an extension of time is not sought for any improper purpose or other purpose
11 of delay. Rather, it is sought by the parties solely to allow sufficient time to review each
12 other's final redlines, finalize the list of exhibits that the parties with mark as Joint Exhibits,
13 and file the final Joint Pretrial Order in light of the delay caused by plaintiff's counsel's
14 daughter's illness and her being out of work caring for her daughter.

15 WHEREFORE, the parties respectfully request that the Court extend the Joint Pretrial Order
16 deadline from October 19, 2022 up to and including October 26, 2022 in this matter.

17 DATED this 19th day of October, 2022.

<p>18 MELANIE HILL LAW PLLC</p> <p>19 By: <u>/s/ Melanie A. Hill</u></p> <p>20 Melanie A. Hill, Esq. (NV Bar No. 8796)</p> <p>21 1925 Village Center Circle, Ste. 150</p> <p>22 Las Vegas, Nevada 89134</p> <p>23 Telephone: (702) 362-8500</p> <p>24 Facsimile: (702) 362-8505</p> <p>25 Melanie@MelanieHillLaw.com</p> <p>26 <i>Attorneys for Plaintiff Pamela Dittmar</i></p>	<p>KAMER ZUCKER ABBOTT</p> <p>By: <u>/s/ Kaitlin H. Paxton</u></p> <p>R. Todd Creer (NV Bar No. 10016)</p> <p>Kaitlin H. Paxton (NV Bar No. 13625)</p> <p>3000 West Charleston Blvd., Suite 3</p> <p>Las Vegas, Nevada 89102</p> <p>Telephone: (702) 259-8640</p> <p>Facsimile: (702) 259-8646</p> <p>kpaxton@kzalaw.com</p> <p><i>Attorneys for Defendant City of North Las Vegas</i></p>
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27 Based on the parties' stipulations [ECF Nos. 125, 126] and good cause appearing, **IT IS SO**
28 **ORDERED.**

11/8/22

DATE



UNITED STATES DISTRICT JUDGE