Dittmar v. City of	North Las Vegas	Dod	. 216
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8 9	UNITED STATES	DISTRICT COURT	
10	DISTRICT OF NEVADA		
11	**	***	
12	PAMELA DITTMAR,	Case No. 2:17-cv-02916-JAD-BNW	
13	Plaintiff,	STIPULATION AND ORDER TO	
14	v.	EXTEND DEADLINE FOR PLAINTIFF TO FILE HER RESPONSE TO	
15	CITY OF NORTH LAS VEGAS, a municipal corporation,	MOTION FOR ATTORNEYS' FEES [ECF NO. 204]	
16 17	Defendant.	(Third Request)	
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19	NOW COMES the Plaintiff, Pamela Dittm	ar, by and through her attorneys, Melanie Hill and	
20	Melanie Hill Law PLLC, and Defendant, City of North Las Vegas, by and through its attorneys, R.		
21	Todd Creer, Kaitlin H. Paxton, and Kamer Zucker Abbott, who hereby stipulate that the deadline for		
22	Plaintiff to file her response to Defendant's Motion for Attorneys' Fees [ECF No. 204] be extended		
23	two weeks from the current deadline of April 19, 2024 to May 3, 2024. This stipulation is filed		
24	pursuant to Local Rule IA 6-1.		
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This is the third request for an extension of this deadline. The first request was due to counsel's schedule and other case commitments after trial and travel that coincided with the original deadlines. The second request was due to the parties' participation in the Ninth Circuit mediation program for the appeal of this case. This third request is also due to the parties continued participation in the Ninth Circuit mediation program because if the case is resolved it will also resolve this pending motion. In support of this stipulation for extension of this deadline, the parties state as follows:

- 1. The current requested deadline for Plaintiff to file her response to Defendant's Motion for Attorneys' Fees [ECF No. 204] is April 19, 2024. There was a timely motion to continue the deadline [ECF No. 212] filed on April 5, 2024 that remains pending.
- 2. The parties seek this stipulation of Plaintiff's response deadline to the motion for attorneys' fees because the parties are in the middle of a Ninth Circuit mediation of the appeal of this case that will impact the attorneys' fees motion and Plaintiff's need to respond to it in the event the case is resolved. If the mediation resolves the appeal of this case, it could also moot this motion for attorneys' fees. For these reasons, as well as the good cause articulated herein, the parties have stipulated to extend the deadline for Plaintiff to file her response to Defendant's Motion for Attorneys' Fees [ECF No. 204].
- 3. Based on the foregoing, the parties stipulate to extend Plaintiff's deadline to respond to Defendant's Motion for Attorneys' Fees [ECF No. 204] for two additional weeks from April 19, 2024 to May 3, 2024.
- 4. This stipulation for an extension of Plaintiff's response deadline is brought in good faith, establishing good cause, and is not sought for any improper purpose or other purpose of delay. The parties stipulated to extend the response deadline to provide the parties with sufficient time to determine if this case can be resolved through the Ninth Circuit mediation program.
- 5. Through this stipulation, the parties request that the Court extend the deadline for Plaintiff to file her response to Defendant's Motion for Attorneys' Fees from the current deadline of April 19, 2024 that Plaintiff requested by motion for extension [ECF No. 212] to May 3, 2024.

1	WHEREFORE, the parties respectfully request that the Court extend the deadline as
2	stipulated to and requested herein to May 3, 2024.
3	DATED this 19th day of April, 2024.
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5	MELANIE HILL LAW PLLC KAMER ZUCKER ABBOTT
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7	By: /s/ Melanie A. Hill By: /s/ R. Todd Creer Melanie A. Hill, Esq. (NV Bar No. 8796) By: /s/ R. Todd Creer (NV Bar No. 10016)
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12	Attorneys for Defendant City of North Las Vegas
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15	OPDED
	ORDER
15 16	ORDER Because the potential for settlement provides good cause for the requested extension of
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15 16 17 18	Because the potential for settlement provides good cause for the requested extension of time, IT IS SO ORDERED. 4/22/24
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