1 2 3 4 5 6	MELANIE A. HILL, ESQ. Nevada Bar No. 8796 MELANIE HILL LAW PLLC 520 S. 7 th Street, Suite A Las Vegas, NV 89101 Tel: (702) 362-8500 Fax: (702) 362-8505 Melanie@MelanieHillLaw.com <i>Attorney for Plaintiff Pamela Dittmar</i>	
7	UNITED STATES DISTRICT COURT	
8	DISTRICT OF NEVADA	
9	***	**
10	PAMELA DITTMAR,	Case No. 2:17-cv-02916-JAD-PAL
11	Plaintiff,	STIPULATION TO EXTEND
12	v.	DEADLINE FOR PLAINTIFF TO FILE HER AMENDED COMPLAINT
13 14	CITY OF NORTH LAS VEGAS, a municipal corporation,	TO FURTHER CONFER ON PLAINTIFF'S CLAIMS
14	Defendant.	(First Request) ECF No. 23
16		
17	Counsel for Plaintiff, Melanie A. Hill of Melanie Hill Law PLLC, and counsel for Defendant,	
18	R. Todd Creer and Kaitlin H. Paxton of the law firm of Kamer Zucker Abbott, respectfully submit	
19	the following stipulation to extend the deadline for Plaintiff to file her amended complaint to further	
20	meet and confer on Plaintiff's amended claims. The parties make this joint request to extend the	
21	deadline for Plaintiff to file her amended complaint to allow the parties additional time meet and	
22	confer on the claims Plaintiff will pursue in her amended complaint and meaningfully discuss the	
23	arguments raised in Defendant's Motion to Dismiss [ECF No. 8] that was denied without prejudice	
24	"to the City's right to reurge it after Dittmar files her amended complaint." [ECF No. 14].	
25	1. Plaintiff Pamela Dittmar received her right to sue letter from NERC/EEOC for her	
26	second charge of discrimination filed with the Nevada Equal Rights Commission	
27	("NERC") on or about July 23, 2018.	
28		

1	2. Counsel for both parties are requesting additional time to meaningfully meet and confer		
2	and allow Defendant City of North Las Vegas to review Plaintiff's draft amended		
3	complaint before it is filed in an attempt to work out any legal issues to eliminate the		
4	need to file a new motion to dismiss.		
5	3. The requested extension is not for purposes of delay, but to avoid unnecessary litigation		
6	or the wasting of resources and expense on issues that can be resolved between the		
7	parties or through further amendment of the complaint before it is filed.		
8	WHEREFORE, the parties respectfully request that the Court extend Plaintiff's deadline to		
9	file her amended complaint two weeks until September 7, 2018.		
10	DATED this 24th day of August, 2018.		
11	MELANIE HILL LAW PLLC KAMER ZUCKER ABBOTT		
12	MELANIE HILL LAW FLLC KAMER ZUCKER ADDUTT		
13	By: <u>/s/ Melanie A. Hill</u> By: <u>/s/ R. Todd Creer</u>		
14	Melanie A. Hill, Esq.R. Todd CreerNV Bar No. 8796NV Bar No. 10016520 S. 7 th Street, Suite A3000 West Charleston Blvd., Suite 3		
15	Las Vegas, Nevada 89101 Las Vegas, Nevada 89102		
16	Telephone: (702) 362-8500Telephone: (702) 259-8640Facsimile: (702) 362-8505Facsimile: (702) 259-8646		
17	Melanie@MelanieHillLaw.comtcreer@kzalaw.comAttorneys for Plaintiff Pamela DittmarAttorneys for Defendant City of NLV		
18			
19	IT IS SO ORDERED.		
20			
21	US District In Long A Dames		
22	U.S. District Judge Jennifer A. Dorsey August 27, 2018		
23			
24			
25 26			
26			
27			
28			