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 City of North Las Vegas

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

9 PAMELA DITTMAR,	)	Case No. 2:17-cv-02916-JAD-BNW
	)	
10 Plaintiff,	)	<b><u>STIPULATION AND REQUEST FOR</u></b>
	)	<b><u>EXTENSION OF DISPOSITIVE</u></b>
11 vs.	)	<b><u>MOTION AND JOINT PRETRIAL</u></b>
	)	<b><u>ORDER DEADLINES</u></b>
12 CITY OF NORTH LAS VEGAS, a municipal	)	
13 corporation,	)	<b>(First Request)</b>
	)	
14 Defendant.	)	
_____	)	

15 Pursuant to Local Rule IA 6-1 and Local Rule 26-3, the parties, by and through their respective  
 16 counsel of record, stipulate and request that the Court grant an extension of time for the remaining  
 17 deadlines, including dispositive motions, to correspond with today's Order for a three-week extension  
 18 for limited discovery. In support of this Stipulation and Request, the parties state as follows:

- 19 1. Discovery was scheduled to conclude on December 31, 2020 (ECF No. 71).
- 20 2. Defendant filed an Emergency Motion for Protective Order regarding two depositions on
- 21 December 28, 2020 (ECF No. 72). In Plaintiff's Response filed on December 31, 2020, she
- 22 requested the discovery deadline be extended for limited purposes (ECF No. 77).

1 3. On January 8, 2021, the Court ordered a limited, three-week extension to the discovery  
2 deadline from the date of the Order to conduct the two depositions (ECF No. 83). This  
3 creates a new discovery deadline of January 29, 2021.

4 4. Transcripts of depositions typically take two (2) weeks to prepare. Then, the deponents will  
5 each have 30 days to review and make any necessary changes to their deposition transcripts.

6 5. Based on this time frame, the deposition review/correction process will likely not be  
7 completed before the current February 1, 2021 dispositive motion deadline.

8 6. Since the depositions taken by the parties may be important for briefing any dispositive  
9 motions that are filed, the parties are seeking an extension of time of the dispositive motion  
10 deadline to allow for the completion of the deposition review process by both parties. The  
11 parties further seek a corresponding extension for the Joint Pretrial Order. The new deadlines  
12 will be as follows:

13 • Dispositive Motion Deadline: **Monday, March 1, 2021**

14 • Joint Pretrial Order: Pursuant to LR 26(1)(e)(5) the Joint Pretrial Order shall be filed  
15 with this Court no later than thirty (30) days after the date set for filing dispositive  
16 motions, which shall be by **Wednesday, March 31, 2021**, unless dispositive motions  
17 are filed, in which case the date for filing the Joint Pretrial Order shall be suspended  
18 until thirty (30) days after the decision on the dispositive motions or further order of  
19 this Court. The disclosures required by Fed. R. Civ. P. 26(a)(3) and any objections  
20 shall be included in the final pretrial order.

21 7. This Request for an extension of time is not sought for any improper purpose or other purpose  
22 of delay. Rather, it is sought by the parties solely to allow sufficient time to complete  
23 dispositive motions in this case following the conclusion of the deposition review process as  
24 set forth above.

1 8. This is the first request for an extension of time of the dispositive motion and Joint Pretrial  
2 Order deadlines in this matter. Pursuant to LR 26-3, this Request has been made at least 21  
3 days prior to the current dispositive motion deadline.

4 WHEREFORE, the parties respectfully request that the Court extend the dispositive motion deadline  
5 from **February 1, 2021 to March 1, 2021** and the Joint Pretrial Order deadline from **March 3, 2021**  
6 **to March 31, 2021** in this matter.

7 DATED this 8<sup>th</sup> day of January, 2021.

8 Respectfully submitted,

9 MELANIE HILL LAW PLLC

10 /s/ Melanie A. Hill

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Respectfully submitted,

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16 ORDER

17 **IT IS SO ORDERED**

18 **DATED:** 4:29 pm, January 11, 2021

19 

20 **BRENDA WEKSLER**  
21 **UNITED STATES MAGISTRATE JUDGE**