

1 ROBERT W. FREEMAN, ESQ.
 Nevada Bar No. 003062
 2 Email: Robert.Freeman@lewisbrisbois.com
 PRISCILLA L. O'BRIANT, ESQ.
 3 Nevada Bar No. 010171
 Email: Danielle.Miller@lewisbrisbois.com
 4 **LEWIS BRISBOIS BISGAARD & SMITH LLP**
 6385 S. Rainbow Boulevard, Suite 600
 5 Las Vegas, Nevada 89118
 702.893.3383
 6 FAX: 702.893.3789
Attorneys for Defendant
 7 *USAA General Indemnity Company*

8
 9 UNITED STATES DISTRICT COURT
 10 DISTRICT OF NEVADA

11 EMILY ZERVAS,
 12 Plaintiff,

13 vs.

14 USAA GENERAL INDEMNITY COMPANY,
 15 a foreign corporation doing business in
 Nevada, DOES I through X and ROE
 16 CORPORATIONS XI through XX,
 17 Defendants.

CASE NO. 2:18-cv-00051-JAD-GWF

**STIPULATION AND ORDER TO EXTEND
 DEADLINE FOR USAA'S REPLY IN
 SUPPORT OF ITS MOTION FOR
 SUMMARY JUDGMENT**

18
 19 IT IS HEREBY STIPULATED AND AGREED, by and between Defendant USAA
 20 General Indemnity Company ("USAA") and Plaintiff Emily Zervas ("Plaintiff"), by and
 21 through their respective counsel of record:

22 - The due date for USAA's Reply in Support of its Motion to Dismiss (ECF No.
 23 52) be extended from April 16, 2019 to May 17, 2019.

24 - This Request for an extension of time is not sought for any improper
 25 purpose or other purpose of delay. This request for extension is based upon the
 26 following:

27 Counsel for Defendants initiated this request because they have numerous other
 28 briefings due, including for scheduled mediations, and numerous depositions, as well as

1 scheduled time off during the month of April. Additionally, the Motion to File Second
2 Amended Complaint (ECF No. 58), filed concurrently with Plaintiff's Opposition to
3 Defendant's Motion to Dismiss, substantive issues of law that will impact both motions,
4 and require additional briefing which will necessarily impact the Reply in Support of the
5 Motion to Dismiss. This is the first request by USAA and Plaintiff to extend this deadline,
6 which is made in good faith and not for purposes of delay.

7 WHEREFORE, the parties respectfully request that this Court extend the time for
8 USAA to file its Reply in Support of its Motion to Dismiss (ECF No. 52), from April 16,
9 2019 to May 17, 2019.

10 DATED this 10th day of April, 2019

DATED this 10th day of April, 2019

11 SCHUETZE & McGAHA, P.C.

LEWIS BRISBOIS BISGAARD & SMITH LLP

12

13

14 By: /s/ William W. McGaha
15 WILLIAM W. McGAHA, ESQ.
16 Nevada Bar No. 003234
601 S. Rancho Drive, Suite C-20
Las Vegas, Nevada 89106
Telephone: (702) 369-3225
Attorneys for Plaintiff

14 By: /s/ Priscilla L. O'Briant
15 ROBERT W. FREEMAN, ESQ.
16 Nevada Bar No. 003062
PRISCILLA L. O'BRIANT, ESQ.
17 Nevada Bar No. 010171
6385 S. Rainbow Boulevard, Suite 600
Las Vegas, Nevada 89118
Telephone: (702) 893-3383
Attorneys for Defendant
USAA General Indemnity Company

17

18

19

20

ORDER

21

IT IS SO ORDERED.

22

Dated: April 11, 2019.

23

24

25



U.S. DISTRICT COURT JUDGE

26

27

28