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Attorney for Plaintiff In conjunction with Legal Aid Center of Southern Nevada Pro Bono Project

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TERRELL DESHON KEMP, SR.,

Plaintiff,

VS.

LAS VEGAS METROPOLITAN POLICE DEPARTMENT, et al.,

Defendants.

CASE NO: 2:18-cv-00169-RFB-BNW

STIPULATION AND ORDER TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO DEFENDANTS NAPHCARE, INC., LARRY WILLIAMSON, M.D. AND ASHLEY KOMASCAR'S MOTION FOR SUMMARY JUDGMENT

(First Request)

COMES NOW, Plaintiff Terrell Deshon Kemp, Sr., ("Plaintiff"), by and through his counsel, Trevor J. Hatfield, Esq. of the law firm of Hatfield & Associates, Ltd., appearing *pro bono publico*, and Defendants NaphCare, Inc., Larry Williamson, M.D., and Ashley Komacsar, Director of Nursing ("NaphCare Defendants") by and through their counsel, Katherine J. Gordon, Esq. of the law firm of Lewis Brisbois Bisgaard & Smith, LLP, and hereby stipulate and agree to extend the time for Plaintiff to Respond to NaphCare, Inc. Defendants' Motion for Summary Judgment (ECF #84) due on March 15, 2021, to April 15, 2021.

This request is submitted pursuant to LR IA 6-1, 6-2 and 7-1 and is the parties' first request for an extension of time for Plaintiff to respond to Defendants' Motions for Summary Judgment.

Good cause exists for this extension, as the current coronavirus/COVID-19 pandemic has caused, and continues to cause, disruption to the practices of counsel involved in this case. In addition, Plaintiff is incarcerated in Ely State Prison and Plaintiff's Counsel has had difficulty communicating with him to formulate oppositions to Defendants' Motions for Summary Judgment. Additionally, three Motions for Summary Judgment have been filed in this matter and are comprised of voluminous documentation for Plaintiff's counsel and Plaintiff to review to formulate the Oppositions to the Motions for Summary Judgment.

Accordingly, Plaintiff shall have up to and including April 15, 2021, to respond to NaphCare, Inc. Defendants' Motion for Summary Judgment (ECF #84).

Dated this 12th day of March, 2021

Dated this 12th day of March, 2021

HATFIELD & ASSOCIATES

/s/ Trevor J. Hatfield

By:

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16 Tel: (702) 388-4469

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LEWIS BRISBOIS BISGAARD & SMITH, LLP

/s/ Katherine J. Gordon

By:_

S. Brent Vogel, Esq. (SBN 6858) Katherine J. Gordon, Esq. (SBN 5813) 6385 S. Rainbow Boulevard, Suite 600 Las Vegas, Nevada 89118

Tel.: (702) 893-3383

Email: Brent.Vogel@lewisbrisbois.com

Email: Katherine.Gordon@lewisbrisbois.com Attorneys for Defendants NaphCare, Inc., Larry Williamson, M.D., and Ashley Komacsar,

Director of Nursing,

IT IS SO ORDERED:



RICHARD F. BOULWARE, II United States District Judge DATED this 15th day of March, 2021.

Dated this 12th day of March, 2021 2 **KAEMPFER CROWELL** 3 /s/ Ryan W. Daniels 4 By: LYSSA S. ANDERSON, ESQ. (SBN 5781) 5 RYAN W. DANIELS, ESQ. (SBN 13094) 1980 Festival Plaza Drive, Ste. 650 6 Las Vegas, Nevada 89135 7 Tel: (702) 792-7000 Email: landerson@kcnvlaw.com 8 Email: rdaniels@kcnvlaw.com Attorneys for Las Vegas Metropolitan 9 Police Department, Captain Nita Schmidt 10 and Officer Hugh Hardy 11 12 13 14 15 **ORDER** 16 17 IT IS SO ORDERED: 18 UNITED STATES MAGISTRATE JUDGE 19 Dated: 20 CASE NO.: 2:18-cv-00169-RFB-BNW 21 22 23 24 25 26 27 28