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10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 JOE SMITH, an individual;
13 Plaintiff,
14 vs.
15 NICHOLAS & CO. FOODSERVICE, LLC;
16 DOES I through V; and ROE
17 CORPORATIONS vi through X, inclusive;
18 Defendants.

CASE NO: 2:18-cv-00256-KJD-CWH

**STIPULATION AND [PROPOSED] ORDER
TO EXTEND TIME FOR PLAINTIFF
TO RESPOND TO DEFENDANT’S
MOTION FOR SUMMARY JUDGMENT
AND TO EXTEND TIME FOR
DEFENDANT TO REPLY
(First Request)**

19 COMES NOW, Plaintiff, JOE SMITH (hereinafter “Plaintiff”), by and through his
20 counsel, Trevor J. Hatfield, of Hatfield & Associates, Ltd., and Defendant, NICHOLAS & CO.
21 FOODSERVICE, LLC. (hereinafter “Defendant”), by and through its counsel, Anne T. Freeland,
22 Esq. of MICHAEL BEST & FRIEDRICH, LLP, and do hereby stipulate and agree to an
23 extension of time for Plaintiff to respond to Defendant’s Motion for Summary Judgment (ECF
24 #17), that was filed on December 10, 2018, and an extension for Defendant to reply.

25 The reasons the extension is requested is that Plaintiff’s response is due on December 31,
26 2018, which is in the middle of the holiday season. In addition, Plaintiff’s counsel has a
27 Mediation scheduled for December 21, 2018, in a Federal Court matter.

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This request is submitted pursuant to LR IA 6-1, 6-2 and LR II 7-1 and 26-4 and is the parties' first request for an extension of the time for the parties to respond to dispositive motion response deadlines. Accordingly, Plaintiff shall have up to and including January 18, 2019 to respond to Defendant's Motion for Summary Judgment (ECF #17) and Defendant shall have up to and including February 1, 2019, to reply.

Dated this 13th day of December 2018.

Dated this 13th day of December 2018.

HATFIELD & ASSOCIATES, LTD.

MICHAEL BEST & FRIEDRICH, LLP

/s/ Trevor J. Hatfield

/s/ Anne T. Freeland

By: _____
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IT IS SO ORDERED.



UNITED STATES DISTRICT JUDGE

DATED: _____ December 17, 2018.