

1 S. BRENT VOGEL  
 Nevada Bar No. 6858  
 2 [Brent.Vogel@lewisbrisbois.com](mailto:Brent.Vogel@lewisbrisbois.com)  
 JOHN M. ORR  
 3 Nevada Bar No. 14251  
[John.Orr@lewisbrisbois.com](mailto:John.Orr@lewisbrisbois.com)  
 4 LEWIS BRISBOIS BISGAARD & SMITH LLP  
 6385 S. Rainbow Boulevard, Suite 600  
 5 Las Vegas, Nevada 89118  
 Tel.: 702.893.3383  
 6 Fax: 702.893.3789  
*Attorneys for Defendant*  
 7 *Correct Care Solutions, LLC*

8  
 9 UNITED STATES DISTRICT COURT  
 10 DISTRICT OF NEVADA  
 11

12 ROSEN MARIANO, An individual,  
 13  
 Plaintiff,  
 14 vs.  
 15 THE CITY OF LAS VEGAS, a political  
 subdivision of the State of Nevada,  
 16 CORRECTIONAL HEALTHCARE  
 COMPANIES, INC., A Foreign Corporation,  
 17 CORRECT CARE SOLUTIONS LLC, A  
 Foreign Limited Liability Company,  
 18 MICHELLE FREEMAN, Chief of Detention  
 Enforcement for the City of Las Vegas,  
 19 CORRECTION OFFICER DOE 1-10,  
 HEALTHCARE WORKER DOES 11-20,  
 20 DOES 21-99 inclusive, ROE  
 CORPORATIONS 100-199, inclusive,  
 21  
 Defendants.  
 22

Case No. 2:18-cv-01911-APG-GWF

**STIPULATION TO CONTINUE  
 DEFENDANT’S REPLY TO  
 PLAINTIFF’S OPPOSITION TO  
 DEFENDANT’S MOTION FOR  
 SUMMARY JUDGMENT [DOC 51 and  
 Doc 55]**

23 The parties, by and through their respective counsel of record, hereby stipulate and  
 24 request that this Court extend the deadline for Defendants to file their respective Replies to  
 25 Plaintiff’s Oppositions to Defendant’s Motions for Summary Judgment (Doc 51 and Doc  
 26 55) in the above captioned case, up to and including January 16, 2021.

27 This request for an extension of time is not sought for any improper purpose or  
 28 other purpose of delay.



1           Wherefore, the parties respectfully request that this Court extend the time for  
2 Defendant to file its Reply to Plaintiff’s Oppositions to Defendant’s Motion for Summary  
3 Judgment (Doc 51 and Doc 55), up to and including January 16, 2021.

4 DATED: January 7, 2021

DATED: January 7, 2021

5 THE GALLIHER LAW FIRM

LEWIS BRISBOIS BISGAARD & SMITH  
6 LLP

7 */s/ Keith E. Galliher*

*/s/ John M. Orr*

8 KEITH E. GALLIHER, JR., ESQ.  
9 Nevada Bar No.220  
10 1850 E. Sahara Avenue, Suite 107  
11 Las Vegas, Nevada 89104  
12 *Attorneys for Plaintiffs*

S. BRENT VOGEL  
Nevada Bar No. 6858  
JOHN M. ORR  
Nevada Bar No. 14251  
6385 S. Rainbow Boulevard, Suite 600  
Las Vegas, Nevada 89118  
Attorneys for Correct Care Solutions, LLC

13 DATED: January 7, 2021

14  
15 */s/ John A. Curtas*

16 BRADFORD R. JERBIC, ESQ.  
17 Nevada Bar No. 1056  
18 JOHN A. CURTAS  
19 Nevada Bar No. 1841  
20 495 S. Main Street, Sixth Floor  
21 Las Vegas, Nevada 89101  
22 *Attorneys for City of Las Vegas  
and Michele Freeman*

23 **IT IS SO ORDERED**

24 DATED: January 8, 2021

25  
26   
27 \_\_\_\_\_  
28 UNITED STATES DISTRICT JUDGE

## Rokni, Roya

---

**From:** John A. Curtas <jacurtas@LasVegasNevada.GOV>  
**Sent:** Thursday, January 7, 2021 3:53 PM  
**To:** Orr, John; Kathleen Gallagher; Keith Galliher  
**Cc:** Deena Mooney; Rokni, Roya; Cindy Kelly  
**Subject:** [EXT] RE: CCS adv Mariano

Fine with me.

### John A. Curtas

Deputy City Attorney  
City Attorney's Office | Civil Division  
**702-229-2125 (direct) | 702-528-7454 (cell)**  
495 South Main Street, Sixth Floor | Las Vegas, NV 89101



lasvegasnevada.gov



---

**From:** Orr, John <John.Orr@lewisbrisbois.com>  
**Sent:** Thursday, January 07, 2021 3:47 PM  
**To:** Kathleen Gallagher <KGallagher@galliherlawfirm.com>; Keith Galliher <KGalliher@galliherlawfirm.com>; John A. Curtas <jacurtas@LasVegasNevada.GOV>  
**Cc:** Deena Mooney <DMooney@galliherlawfirm.com>; Rokni, Roya <Roya.Rokni@lewisbrisbois.com>; Cindy Kelly <CKelly@LasVegasNevada.GOV>  
**Subject:** RE: CCS adv Mariano

**CAUTION:** This email originated from an **External Source**. Please **use caution** before opening attachments, clicking links, or responding to this email. **Do not sign-in with your City of Las Vegas account credentials.**

Thank you so much. Please confirm that I can affix your esignature.



**John M. Orr**  
Attorney  
[John.Orr@lewisbrisbois.com](mailto:John.Orr@lewisbrisbois.com)  
T: 702.693.4352 F: 702.893.3789

6385 South Rainbow Blvd., Suite 600, Las Vegas, NV 89118 | [LewisBrisbois.com](http://LewisBrisbois.com)

Representing clients from coast to coast. [View our locations nationwide.](#)

This e-mail may contain or attach privileged, confidential or protected information intended only for the use of the intended recipient. If you are not the intended recipient, any review or use of it is strictly prohibited. If you have received this e-mail in error, you are required to notify the sender, then delete this email and any attachment from your computer and any of your electronic devices where the message is stored.

---

**From:** Kathleen Gallagher <[KGallagher@galliherlawfirm.com](mailto:KGallagher@galliherlawfirm.com)>

**Sent:** Thursday, January 7, 2021 3:01 PM

**To:** Orr, John <[John.Orr@lewisbrisbois.com](mailto:John.Orr@lewisbrisbois.com)>; Keith Galliher <[KGalliher@galliherlawfirm.com](mailto:KGalliher@galliherlawfirm.com)>

**Cc:** Deena Mooney <[DMooney@galliherlawfirm.com](mailto:DMooney@galliherlawfirm.com)>; Rokni, Roya <[Roya.Rokni@lewisbrisbois.com](mailto:Roya.Rokni@lewisbrisbois.com)>

**Subject:** [EXT] Re: CCS adv Mariano

External Email

Of course. Send over the stip.

**Kathleen H. Gallagher, Esq.**

Of Counsel

THE GALLIHER LAW FIRM

1850 E. Sahara Avenue, Ste. 107

Las Vegas, Nevada 89104

[kgallagher@galliherlawfirm.com](mailto:kgallagher@galliherlawfirm.com)

Tele: 702-735-0049

Fax: 702-735-0204

**CONFIDENTIAL.** This e-mail message and the information it contains is intended only for the named recipient(s) and may contain information that is a trade secret, proprietary, privileged, or attorney work product. This message is intended to be privileged and confidential communications protected from disclosure. If you are not the named recipient(s), any dissemination, distribution or copying is strictly prohibited. If you have received this e-mail message in error, please notify the sender by e-mail and permanently delete this message and any attachments from your workstation or network mail system.

**TAX OPINION DISCLAIMER.** To comply with IRS regulations, we advise that any discussion of Federal tax issues in this e-mail was not intended or written to be used, and cannot be used by you (i) to avoid any penalties imposed under the Internal Revenue Code; or (ii) to promote, market or recommend to another party any transaction or matter addressed herein.

---

**From:** Orr, John <[John.Orr@lewisbrisbois.com](mailto:John.Orr@lewisbrisbois.com)>

**Sent:** Thursday, January 7, 2021 2:48 PM

**To:** Keith Galliher; Kathleen Gallagher  
**Cc:** Deena Mooney; Rokni, Roya  
**Subject:** CCS adv Mariano

Hi Keith and Kathleen

I hope you both are well and enjoyed the holidays. I'm writing to request just until Jan 16, to submit our reply to the pending MSJ. It's currently due on Jan 11. I hate to ask for another extension, but I'm up against a few other tight deadlines. I appreciate your courtesy. Please let me know, and I'll circulate a stip. Thank you, so much.

Sent from my iPhone



**John M. Orr**  
**Attorney**  
[John.Orr@lewisbrisbois.com](mailto:John.Orr@lewisbrisbois.com)  
**T: 702.693.4352 F: 702.893.3789**

6385 South Rainbow Blvd., Suite 600, Las Vegas, NV 89118 | [LewisBrisbois.com](http://LewisBrisbois.com)

**Representing clients from coast to coast. View our locations nationwide.**

This e-mail may contain or attach privileged, confidential or protected information intended only for the use of the intended recipient. If you are not the intended recipient, any review or use of it is strictly prohibited. If you have received this e-mail in error, you are required to notify the sender, then delete this email and any attachment from your computer and any of your electronic devices where the message is stored.

## Rokni, Roya

---

**From:** Orr, John  
**Sent:** Thursday, January 7, 2021 4:26 PM  
**To:** Rokni, Roya  
**Subject:** FW: CCS adv Mariano

**John M. Orr**  
**Attorney**  
Las Vegas Rainbow  
702.693.4352 or x7024352

---

**From:** Keith Galliher <KGalliher@galliherlawfirm.com>  
**Sent:** Thursday, January 7, 2021 4:28 PM  
**To:** Orr, John <John.Orr@lewisbrisbois.com>  
**Subject:** [EXT] Re: CCS adv Mariano

John: You may esign for me.

---

**From:** Orr, John <[John.Orr@lewisbrisbois.com](mailto:John.Orr@lewisbrisbois.com)>  
**Sent:** Thursday, January 7, 2021 3:47 PM  
**To:** Kathleen Gallagher; Keith Galliher; 'John A. Curtas'  
**Cc:** Deena Mooney; Rokni, Roya; Cindy Kelly  
**Subject:** RE: CCS adv Mariano

Thank you so much. Please confirm that I can affix your esignature.



**John M. Orr**  
**Attorney**  
[John.Orr@lewisbrisbois.com](mailto:John.Orr@lewisbrisbois.com)  
T: 702.693.4352 F: 702.893.3789

6385 South Rainbow Blvd., Suite 600, Las Vegas, NV 89118 | [LewisBrisbois.com](http://LewisBrisbois.com)

**Representing clients from coast to coast. View our locations nationwide.**

This e-mail may contain or attach privileged, confidential or protected information intended only for the use of the intended recipient. If you are not the intended recipient, any review or use of it is strictly prohibited. If you have received this e-mail in error, you are required to notify the sender, then delete this email and any attachment from your computer and any of your electronic devices where the message is stored.

---

**From:** Kathleen Gallagher <[KGallagher@galliherlawfirm.com](mailto:KGallagher@galliherlawfirm.com)>  
**Sent:** Thursday, January 7, 2021 3:01 PM  
**To:** Orr, John <[John.Orr@lewisbrisbois.com](mailto:John.Orr@lewisbrisbois.com)>; Keith Galliher <[KGalliher@galliherlawfirm.com](mailto:KGalliher@galliherlawfirm.com)>

Cc: Deena Mooney <[DMooney@gallihierlawfirm.com](mailto:DMooney@gallihierlawfirm.com)>; Rokni, Roya <[Roya.Rokni@lewisbrisbois.com](mailto:Roya.Rokni@lewisbrisbois.com)>

Subject: [EXT] Re: CCS adv Mariano

External Email

Of course. Send over the stip.

**Kathleen H. Gallagher, Esq.**

Of Counsel

THE GALLIHER LAW FIRM

1850 E. Sahara Avenue, Ste. 107

Las Vegas, Nevada 89104

[kgallagher@gallihierlawfirm.com](mailto:kgallagher@gallihierlawfirm.com)

Tele: 702-735-0049

Fax: 702-735-0204

**CONFIDENTIAL.** This e-mail message and the information it contains is intended only for the named recipient(s) and may contain information that is a trade secret, proprietary, privileged, or attorney work product. This message is intended to be privileged and confidential communications protected from disclosure. If you are not the named recipient(s), any dissemination, distribution or copying is strictly prohibited. If you have received this e-mail message in error, please notify the sender by e-mail and permanently delete this message and any attachments from your workstation or network mail system.

**TAX OPINION DISCLAIMER.** To comply with IRS regulations, we advise that any discussion of Federal tax issues in this e-mail was not intended or written to be used, and cannot be used by you (i) to avoid any penalties imposed under the Internal Revenue Code; or (ii) to promote, market or recommend to another party any transaction or matter addressed herein.

---

**From:** Orr, John <[John.Orr@lewisbrisbois.com](mailto:John.Orr@lewisbrisbois.com)>

**Sent:** Thursday, January 7, 2021 2:48 PM

**To:** Keith Galliher; Kathleen Gallagher

**Cc:** Deena Mooney; Rokni, Roya

**Subject:** CCS adv Mariano

Hi Keith and Kathleen

I hope you both are well and enjoyed the holidays. I'm writing to request just until Jan 16, to submit our reply to the pending MSJ. It's currently due on Jan 11. I hate to ask for another extension, but I'm up against a few other tight deadlines. I appreciate your courtesy. Please let me know, and I'll circulate a stip. Thank you, so much.

Sent from my iPhone



**John M. Orr**  
**Attorney**  
[John.Orr@lewisbrisbois.com](mailto:John.Orr@lewisbrisbois.com)  
T: 702.693.4352 F: 702.893.3789

6385 South Rainbow Blvd., Suite 600, Las Vegas, NV 89118 | [LewisBrisbois.com](http://LewisBrisbois.com)

**Representing clients from coast to coast. View our locations nationwide.**

This e-mail may contain or attach privileged, confidential or protected information intended only for the use of the intended recipient. If you are not the intended recipient, any review or use of it is strictly prohibited. If you have received this e-mail in error, you are required to notify the sender, then delete this email and any attachment from your computer and any of your electronic devices where the message is stored.