

SEMENZA KIRCHER RICKARD
10161 Park Run Drive, Suite 150
Las Vegas, Nevada 89145
Telephone: (702) 835-6803

1 Lawrence J. Semenza, III, Esq., Bar No. 7174
2 Email: ljs@skrlawyers.com
3 Christopher D. Kircher, Esq., Bar No. 11176
4 Email: cdk@skrlawyers.com
5 Jarrod L. Rickard, Esq., Bar No. 10203
6 Email: jlr@skrlawyers.com
7 Katie L. Cannata, Esq., Bar No. 14848
8 Email: klc@skrlawyers.com
9 SEMENZA KIRCHER RICKARD
10 10161 Park Run Drive, Ste. 150
11 Las Vegas, Nevada 89145
12 Telephone: (702) 835-6803
13 Facsimile: (702) 920-8669

14 *Attorneys for Plaintiff Bridgett Dahl*

15 **UNITED STATES DISTRICT COURT**

16 **DISTRICT OF NEVADA**

17 BRIDGETT DAHL, an individual,
18
19 Plaintiff,
20
21 v.
22 JACOB MANDRUSIAK a/k/a JAKE
23 MANDRUSIAK, an individual; DOES 1-10,
24 unknown individuals; and ROE COMPANIES
25 1-10, unknown business entities,
26
27 Defendants.

Case No.: 2:18-cv-02225-APG-DJA

**STIPULATION AND ORDER TO
CONTINUE THE JURY TRIAL DATE**

(First Request)

28 Plaintiff Bridgett Dahl ("Plaintiff") and Defendant Jacob Mandrusiak ("Defendant") (together, the "Parties"), by and through their respective counsel of record, hereby stipulate and agree to the following:

1. On September 2, 2020, the Court granted the Parties' Joint Pretrial Order [ECF 76] and set this case for jury trial on a stacked calendar on February 8, 2021 at 9:00 a.m. in Courtroom 6C. Calendar Call is set for February 2, 2021 at 8:45 a.m. in Courtroom 6C.

2. Due to the current events concerning COVID-19, the Court entered Third Amended Temporary General Order 2020-03 on November 12, 2020, stating that all jury trials will be postponed until further notice, and the presiding judges will address the need for any trial

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1 continuance in their individual cases. In light of this order, the Parties have not sought or
2 received commitments from their retained experts to appear for the current trial date.

3 3. Additionally, Defendant is a Canadian citizen and the border between the United
4 States and Canada remains closed concerning COVID-19. As such, Defendant would likely be
5 unable to attend trial in person even if it were to move forward on the scheduled date.

6 4. Additionally, Plaintiff recently gave birth to a baby on December 29, 2020, and is
7 dealing with issues related to being a new mother.

8 5. Accordingly, the Parties have agreed to continue the jury trial in this matter by
9 three (3) months and jointly offer these three new trial dates: May 10, 2021, May 17, 2021, and
10 May 24, 2021.

11 6. The Parties estimate that the jury trial in this matter will take a total of 5-10 days.

12 7. It is expressly understood by the undersigned that the Court will set the jury trial
13 in this matter on one of the agreed-upon dates if possible; if not, the trial will be set at the
14 convenience of the Court's calendar.

15 8. The Parties additionally request that the current Calendar Call in this matter,
16 currently scheduled for February 2, 2021 at 8:45 a.m., be rescheduled in accordance with the
17 continued trial date.

18 Dated this 6th day of January, 2021.

Dated this 6th day of January, 2021.

19 SEMENZA KIRCHER RICKARD

WILSON ELSER MOSKOWITZ EDELMAN
& DICKER LLP

21 /s/ Jarrod L. Rickard
Lawrence J. Semenza, III, Bar No. 7174
22 Christopher D. Kircher, Bar No. 11176
Jarrod L. Rickard, Bar No. 10203
23 Katie L. Cannata, Esq., Bar No. 14848
10161 Park Run Dr., Ste. 150
24 Las Vegas, Nevada 89145
25 *Attorneys for Plaintiff Bridgett Dahl*
26

/s/ Michael P. Lowry
Michael P. Lowry, Esq., Bar No. 10666
Jonathan C. Pattillo, Esq., Bar No. 13929
6689 Las Vegas Blvd. South, Ste. 200
Las Vegas, Nevada 89119
Attorneys for Defendant,
Jacob Mandrusiak a/k/a Jake Mandrusiak

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1 **IT IS SO ORDERED:**

2 This case is set for jury trial on the stacked calendar on May 17, 2021 in Courtroom
3 6C. Calendar Call will be held on May 11, 2021 at 8:45 a.m. in Courtroom 6C.

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6 **UNITED STATES DISTRICT JUDGE**

7 **DATED:** January 6, 2021

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