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10 Attorneys for Plaintiff,  
 11 *James M. Herndon*

12 UNITED STATES DISTRICT COURT  
 13 DISTRICT OF NEVADA

14 \* \* \*

15 **James M. Herndon,**

16 Plaintiff,

17 vs.

CASE NO.: 2:19-cv-00018-GMN-VCF

18 **City of Henderson,** a political  
 19 subdivision of The State of Nevada; **Sgt.**  
 20 **M. Gillis,** individually and in his official  
 capacity as a police officer; **Officer L.**  
 21 **Good,** individually and in his official  
 capacity as a police officer; **Officer A.**  
 22 **Nelson,** individually and in his official  
 capacity as a police officer; **Officer D.**  
 23 **Nerbonne,** individually and in his official  
 capacity as a police officer; **Officer D.**  
 24 **Russo,** individually and in his official  
 capacity as a police officer; **Officer E.**  
 25 **Vega,** individually and in his official  
 26 capacity as a police officer; Doe Officers  
 27 I through X, inclusive and Roe Entities I  
 28 through X, inclusive

**Stipulation and Order to Extend  
 Response to Defendants, City of  
 Henderson and Sgt. M. Gillis's  
 Motion for Summary Judgment [ECF  
 No. 119]**



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Defendants.

Plaintiff, James Herndon, through his counsel of record, Marjorie L. Hauf, Esq. and Matthew G. Pfau, Esq., of H & P LAW, and Defendants, City of Henderson, Sgt. M. Gillis, Officer L. Good, Officer A. Nelson, Officer D. Nerbonne, Officer D. Russo, and Officer E. Vega through their counsel of record, Craig R. Anderson, Esq. and Reagan A. Weber, Esq. of MARQUIS AURBACH, do hereby stipulate and agree to extend the due date of Plaintiff's Response to Defendants, City of Henderson and Sgt. M. Gillis's Motion for Summary Judgment [ECF No. 119].

Currently, Plaintiff's Response is due March 17, 2023. Plaintiff and Defendant agree to extend the Deadline for Plaintiff to file his Response to March 24, 2023. The extension is being requested in good faith and not for the purpose of delay. The extension is being requested as the issues to be briefed are extensive and complicated. In addition to Plaintiff's counsel, Marjorie Hauf, Esq. being in a 3-day binding arbitration earlier this month, Matthew G. Pfau, Esq. has been unavailable the last two weeks. These circumstances unfortunately delayed Plaintiff's efforts to respond to Defendant's Motion.

**Stipulation**

It is hereby STIPULATED between James Herndon, through his counsel of record, Marjorie L. Hauf, Esq. and Matthew G. Pfau, Esq., of H & P LAW, and Defendants, City of Henderson, Sgt. M. Gillis, Officer L. Good, Officer A. Nelson, Officer D. Nerbonne, Officer D. Russo, and Officer E. Vega through their counsel of record, Craig R. Anderson, Esq. and Reagan A. Weber, Esq. of MARQUIS AURBACH, to extend the due date of Plaintiff's Response to Defendants, City of Henderson and Sgt. M. Gillis's Motion for Summary Judgment [ECF No. 119].



1 IT IS FURTHER STIPULATED that Plaintiff's Response to Defendants, City of  
2 Henderson and Sgt. M. Gillis's Motion for Summary Judgment must be filed by March  
3 24, 2023.

4 WHEREFORE, the parties respectfully request that the Court enter its order  
5 extending the deadline as described in the stipulation above.

6 DATED this 16th day of March 2023.

7  
8 Respectfully submitted by:  
9 H & P LAW

Approved as to form and content:  
MARQUIS AURBACH

10 /s/ Marjorie Hauf  
11 Marjorie L. Hauf, Esq.  
12 Nevada Bar No.: 8111  
Matthew G. Pfau, Esq.  
Nevada Bar No.: 11439

/s/ Craig Anderson  
Craig R. Anderson, Esq.  
Nevada Bar No.: 6882  
Reagan A. Weber, Esq.  
Nevada Bar No.: 16151

13 Attorneys for Plaintiff,  
14 James M. Herndon

Attorneys for Defendants,  
City of Henderson and Sgt. S. Gillis

15 **Order**

16 IT IS SO ORDERED.

17 Dated this 17 day of March 2023.

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21 UNITED STATES DISTRICT JUDGE