

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Marjorie L. Hauf, Esq.
Nevada Bar No.: 8111
Matthew G. Pfau, Esq.
Nevada Bar No.: 11439
Cara Xidis, Esq.
Nevada Bar No.: 11743
H&P LAW
8950 W Tropicana Ave., #1
Las Vegas, NV 89147
702 598 4529 TEL
702 598 3626 FAX
mhauf@courtroomproven.com
mpfau@courtroomproven.com

Attorneys for Plaintiff,
James M. Herndon

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

James M. Herndon,

Plaintiff,

vs.

City of Henderson, a political subdivision of The State of Nevada; **Sgt. M. Gillis,** individually and in his official capacity as a police officer; **Officer L. Good,** individually and in his official capacity as a police officer; **Officer A. Nelson,** individually and in his official capacity as a police officer; **Officer D. Nerbonne,** individually and in his official capacity as a police officer; **Officer D. Russo,** individually and in his official capacity as a police officer; **Officer E. Vega,** individually and in his official capacity as a police officer; Doe Officers I through X, inclusive and Roe Entities I through X, inclusive

Defendants.

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

Stipulation and Order to Extend Briefing Deadlines (ECF # 55)





1 Plaintiff, James Herndon, through his counsel of record, Marjorie L. Hauf, Esq. and
2 Matthew G. Pfau, Esq., of H & P LAW, and Defendants, City of Henderson, Sgt. M.
3 Gillis, Officer L. Good, Officer A. Nelson, Officer D. Nerbonne, Officer D. Russo, and
4 Officer E. Vega through their counsel of record, Nicholas G. Vaskov, Esq. and Nancy
5 D. Savage, Esq. of CITY ATTORNEY'S OFFICE, do hereby stipulate and agree to
6 Extend the due dates of Plaintiff's Opposition to Defendants, Sgt. M. Gillis, Officer L.
7 Good, Officer A. Nelson, Officer D. Nerbonne, Officer D. Russo, and Officer E. Vega's
8 Motion for Summary Judgment and Defendant's Reply in Support to Defendants, Sgt.
9 M. Gillis, Officer L. Good, Officer A. Nelson, Officer D. Nerbonne, Officer D. Russo,
10 and Officer E. Vega's Motion for Summary Judgment.

11 Currently, Plaintiff's Opposition is due November 16, 2020. Plaintiff and
12 Defendant agree to Extend the Deadline for Plaintiff to file his Opposition to
13 December 2, 2020 and for Defendant to file their Reply in Support to
14 December 21, 2020. The extensions are being requested in good faith and not for
15 the purpose of delay. The extensions are being requested as the issues to be briefed
16 are extensive and complicated. The parties anticipate that additional time, from that
17 provided in the applicable court rules, will be needed to adequately address the
18 issues and complete their respective briefings for submission to the court.

19
20 **Stipulation**

21 It is hereby STIPULATED between James Herndon, through his counsel of record,
22 Marjorie L. Hauf, Esq. and Matthew G. Pfau, Esq., of H & P LAW, and Defendants,
23 City of Henderson, Sgt. M. Gillis, Officer L. Good, Officer A. Nelson, Officer D.
24 Nerbonne, Officer D. Russo, and Officer E. Vega through their counsel of record,
25 Nicholas G. Vaskov, Esq. and Nancy D. Savage, Esq. of CITY ATTORNEY'S OFFICE,
26 to Extend Breifing Deadlines Related to Defendants, Sgt. M. Gillis, Officer L. Good,
27 Officer A. Nelson, Officer D. Nerbonne, Officer D. Russo, and Officer E. Vega's Motion
28 for Summary Judgment and Defendant's Reply in Support to Defendants, Sgt. M.

1 Gillis, Officer L. Good, Officer A. Nelson, Officer D. Nerbonne, Officer D. Russo, and
2 Officer E. Vega's Motion for Summary Judgment, ECF # 55.

3 IT IS FURTHER STIPULATED that Plaintiff's Opposition to Defendant, Sgt. M.
4 Gillis, Officer L. Good, Officer A. Nelson, Officer D. Nerbonne, Officer D. Russo, and
5 Officer E. Vega's Motion for Summary Judgment must be filed by December 2, 2020.

6 IT IS FURTHER STIPULATED that Defendants, Sgt. M. Gillis, Officer L. Good,
7 Officer A. Nelson, Officer D. Nerbonne, Officer D. Russo, and Officer E. Vega's Reply
8 in Support of Motion for Summary Judgment must be filed by December 21, 2020.

9
10 DATED this 10th day of November 2020.

11
12 Respectfully submitted by:

13 H & P LAW

14 /s/ Marjorie L. Hauf, Esq.

15 Marjorie L. Hauf, Esq.

16 Nevada Bar No.: 8111

17 Matthew G. Pfau, Esq.

18 Nevada Bar No.: 11439

19
20 Attorneys for Plaintiff,
21 James M. Herndon

22 Approved as to form and content:

23 CITY ATTORNEY'S OFFICE

24 /s/ Nancy Savage, Esq.

25 Nicholas G. Vaskov, Esq.

26 Nevada Bar No.: 8298

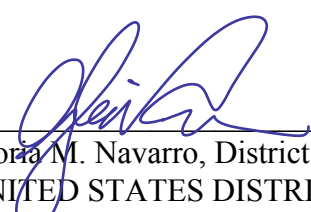
27 Nancy D. Savage, Esq.

28 Nevada Bar No.: 392

Attorneys for Defendants,
*City of Henderson, Sgt. S. Gillis, and
Officers L. Good, A. Nelson, D.
Nerbonne, D. Russo, and E. Vega*

IT IS SO ORDERED.

Dated this 18 day of November, 2020


Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT

