



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 Reply in Support to Motion for Leave to Supplement Opposition to Defendant's Officers Motion for Summary Judgment and City of Henderson Motion for Summary Judgment Deadlines (ECF # 80 and 81)**



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 Reply in Support to Motion for Leave to Supplement  
7 Opposition to Defendant's Officers Motion for Summary Judgment and City of  
8 Henderson Motion for Summary Judgment Deadlines.

9 Currently, Plaintiff's Reply in Support is due May 26, 2021. Plaintiff and Defendant  
10 agree to Extend the Deadline for Plaintiff to file Opposition to June 2, 2020. The  
11 extensions are being requested in good faith and not for the purpose of delay. The  
12 extensions are being requested as the issues to be briefed are extensive and  
13 complicated. Plaintiff's, Marjorie L. Hauf, Esq. and Matthew G. Pfau, Esq.. of H & P  
14 LAW, are in trial the week of original due date. This setback unfortunately delayed  
15 Plaintiff's efforts to reply to this opposition.

16  
17 **Stipulation**

18 It is hereby STIPULATED between James Herndon, through his counsel of record,  
19 Marjorie L. Hauf, Esq. and Matthew G. Pfau, Esq.. of H & P LAW, and Defendants,  
20 City of Henderson, Sgt. M. Gillis, Officer L. Good, Officer A. Nelson, Officer D.  
21 Nerbonne, Officer D. Russo, and Officer E. Vega through their counsel of record,  
22 Nicholas G. Vaskov, Esq. and Nancy D. Savage, Esq. of CITY ATTORNEY'S OFFICE,  
23 to Extend Reply in Support to Motion for Leave to Supplement Opposition to  
24 Defendant's Officers Motion for Summary Judgment and City of Henderson Motion  
25 for Summary Judgment Deadlines, ECF # 80 and 81.

26 IT IS FURTHER STIPULATED that Plaintiff's Reply in Support to Motion for  
27 Leave to Supplement Opposition to Defendant's Officers Motion for Summary  
28 Judgment and City of Henderson Motion for Summary Judgment must be filed by



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

June 2, 2021.

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

DATED this 26th day of May 2021.

Respectfully submitted by:

H & P LAW  
/s/ Marjorie Hauf, Esq.  
\_\_\_\_\_  
Marjorie L. Hauf, Esq.  
Nevada Bar No.: 8111  
Matthew G. Pfau, Esq.  
Nevada Bar No.: 11439

Attorneys for Plaintiff,  
*James M. Herndon*


Approved as to form and content:

CITY ATTORNEY'S OFFICE  
/s/ Nancy Savage, Esq.  
\_\_\_\_\_  
Nicholas G. Vaskov, Esq.  
Nevada Bar No.: 8298  
Nancy D. Savage, Esq.  
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 26 day of May, 2021

  
\_\_\_\_\_  
Gloria M. Navarro, District Judge  
UNITED STATES DISTRICT COURT