

1 **Marquis Aurbach Coffing**
 Nick D. Crosby, Esq.
 2 Nevada Bar No. 8996
 10001 Park Run Drive
 3 Las Vegas, Nevada 89145
 Telephone: (702) 382-0711
 4 Facsimile: (702) 382-5816
 ncrosby@maclaw.com
 5 *Attorneys for Defendants, LVMPD,*
Joseph Lombardo, John Pelletier, Richard Maupin,
 6 *Ryan Fryman, Juan Contreras, Allen Pavese and*
Brandon Meads

8 **UNITED STATES DISTRICT COURT**
 9 **DISTRICT OF NEVADA**

10 NEBYOU SOLOMON, an individual,
 11 **Plaintiff,**

12 vs.

13 LAS VEGAS METROPOLITAN POLICE
 DEPARTMENT; JOSEPH LOMBARDO,
 14 individually and in his official capacity as
 Sheriff; JOHN L. PELLETIER, an individual;
 15 RICHARD E. MAUPIN, an individual;
 RYAN J. FRYMAN, an individual; JUAN D.
 16 CONTRERAS, an individual; ALLEN J.
 PAVESE, an individual; BRANDON M.
 17 MEADS, an individual; FASHION SHOW
 MALL, LLC, a Nevada limited-liability
 18 company; UNIVERSAL PROTECTION
 SERVICE, LLC, a Nevada limited-liability
 19 company; ANDREW ANTONIO, an
 individual, EDUARDO AGUILAR, an
 20 individual, DOES I-V, individuals,
 21 **Defendants.**

Case Number: 2:19-cv-00652-JAD-DJA

STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES
(SIXTH REQUEST)

23 Pursuant to Fed. R. Civ. P. 16(b)(4) and Local Rule 26-3, Defendants, the Las Vegas
 24 Metropolitan Police Department (the "Department" or "LVMPD"), Joseph Lombardo
 25 ("Lombardo"), John Pelletier ("Pelletier"), Richard Maupin ("Maupin"), Ryan Fryman
 26 ("Fryman"), Juan Contreras ("Contreras"), Allen Pavese ("Pavese"), and Brandon Meads
 27 ("Meads") (collectively "LVMPD Defendants"), by and through their counsel of record,

MARQUIS AURBACH COFFING

10001 Park Run Drive
 Las Vegas, Nevada 89145
 (702) 382-0711 FAX: (702) 382-5816

1 Nick D. Crosby, Esq., of the law firm of Marquis Aurbach Coffing; and Plaintiff Nebyou
 2 Solomon (“Solomon”), by and through his counsel of record, Margaret A. McLetchie, Esq.,
 3 Alina M. Shell, Esq. and Leo S. Wolpert, Esq., of the McLetchie Law firm, hereby stipulates
 4 and requests the Court to extend the discovery deadlines by fourteen (14) days as follows.

5 **I. DISCOVERY CUT-OFF DEADLINES**

	Current Deadlines	Proposed Deadlines
6 Discovery Cut-Off	June 23, 2021	July 7, 2021
7 Dispositive Motions	July 23, 2021	August 5, 2021
8 Pre-Trial Order	August 25, 2020	September 8, 2021

11 **II. REASON FOR REQUESTED EXTENSION**

12 This Stipulation is made in good faith and not for purposes of delay. Specifically,
 13 Defendants’ counsel’s time in recent weeks was predominantly occupied in the defense of
 14 an unfair labor practices trial before the National Labor Relations Board, followed by a
 15 subsequent 10(j) injunction proceeding in the same matter. As a result, counsel requested
 16 additional time to respond to written discovery propounded by Plaintiff, which Plaintiff’s
 17 counsel obliged. As such, counsel will need more time to respond to the written discovery
 18 for Plaintiff’s counsel to review, prior to depositions. The Parties agree they will require
 19 additional time to coordinate depositions, for which the Parties have discussed and are
 20 coordinating.

21 **III. CONCLUSION**

22 Based on the above, the Parties respectfully request that this Court extend the current
 23 deadlines by fourteen (14) days in order to allow the Parties adequate time to complete
 24 discovery and resolve any present conflicts.

25 ///

26 ///

27 ///

MARQUIS AURBACH COFFING
 10001 Park Run Drive
 Las Vegas, Nevada 89145
 (702) 382-0711 FAX: (702) 382-5816

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

IT IS SO STIPULATED.

Dated this 28th day of May, 2021.

Dated this U28th day of May, 2021.

MARQUIS AURBACH COFFING

MCLETCHIE LAW

By: /s/ Nick D. Crosby, Esq.
Nick D. Crosby, Esq.
Nevada Bar No. 8996
10001 Park Run Drive
Las Vegas, Nevada 89145
Attorneys for LVMPD Defendants

By: /s/ Alina M. Shell, Esq.
Margaret A. McLetchie, Esq.
Nevada Bar No. 10931
Alina M. Shell, Esq.
Nevada Bar No. 11711
Leo S. Wolpert, Esq.
Nevada Bar No. 12658
701 East Bridger Ave., Suite 520
Las Vegas, Nevada 89101
Attorneys for Plaintiff

ORDER

IT IS SO ORDERED:

DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE

DATED: June 2, 2021

MARQUIS AURBACH COFFING
10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816

Suzanne Boggs

From: Alina <Alina@nvlitigation.com>
Sent: Friday, May 28, 2021 1:33 PM
To: Nick Crosby; Maggie; Leo Wolpert
Cc: Suzanne Boggs; Pharan
Subject: RE: [External] SAO -- Solomon [IWOV-iManage.FID1081742]

Hi Nick:

Sorry for the slight delay. We are moving offices this weekend and it's been...busy. You have my authorization to affix my e-signature and file.

Thanks!

Alina

Alina M. Shell



ATTORNEYS AT LAW

701 E. Bridger Ave., Ste. 520
Las Vegas, NV 89101
(702)728-5300 (T) / (702)425-8220 (F)
www.nvlitigation.com

IMPORTANT NOTICE: Privileged and/or confidential information, including attorney-client communication and/or attorney work product may be contained in this message. This message is intended only for the individual or individuals to whom it is directed. If you are not an intended recipient of this message (or responsible for delivery of this message to such person), any dissemination, distribution or copying of this communication is strictly prohibited and may be a crime. No confidentiality or privilege is waived or lost by any misdirection of this message. If you received this message in error, please immediately delete it and all copies of it from your system, destroy any hard copies of it and notify the sender by return e-mail.

From: Nick Crosby <NCrosby@maclaw.com>
Sent: Thursday, May 27, 2021 4:21 PM
To: Alina <Alina@nvlitigation.com>; Maggie <maggie@nvlitigation.com>; Leo Wolpert <Leo@NVLITIGATION.COM>
Cc: Suzanne Boggs <sboggs@maclaw.com>; Pharan <pharan@nvlitigation.com>
Subject: SAO -- Solomon [IWOV-iManage.FID1081742]

Good Afternoon All – Attached is a draft SAO in this case. Please let me know if you have any changes, comments or questions.

Thanks!



**MARQUIS AURBACH
COFFING**

Nicholas D. Crosby, Esq.
10001 Park Run Drive

Las Vegas, NV 89145
t | 702.942.2158
f | 702.382.5816
ncrosby@maclaw.com | [vcard](#)
maclaw.com



Please consider the environment before printing this e-mail!

DO NOT read, copy or disseminate this communication unless you are the intended addressee. This e-mail communication contains confidential and/or privileged information intended only for the addressee. If you have received this communication in error, please call us (collect) immediately at (702) 382-0711 and ask to speak to the sender of the communication. Also please e-mail the sender and notify the sender immediately that you have received the communication in error. Thank you. Marquis Aurbach Coffing - Attorneys at Law

This email has been scanned for spam and viruses by Proofpoint Essentials. Click [here](#) to report this email as spam.