

1 ZARINAH J. MUHAMMAD, ESQ.
 2 NEVADA BAR# 12830
 3 JUSTICE FORCE LAW GROUP
 4 6278 RUBY KINGLET
 5 LAS VEGAS, NV, 89148
 6 PHONE: 702-203-3530
 7 FAX: 702-251-3769
 8 ZARINAHATTORNEYATLAW@GMAIL.COM
 9 ATTORNEY FOR PLAINTIFFS

7 **UNITED STATES DISTRICT COURT**
 8 **FOR THE DISTRICT OF NEVADA**

10 A.M., a minor by and through her natural
 11 parent and guardian, ZARINAH
 12 MUHAMMAD; ZARINAH MUHAMMAD

12 Plaintiffs,

13 v.

14 CLARK COUNTY SCHOOL DISTRICT;
 15 JESUS JARA; A.J. ADAMS; FELICIA
 16 GONZALES; DIANE LEWIS;
 17 CHRISTOPHER SPARROW; JOHN DOE
 18 DEFENDANTS I THROUGH X; and, ROE
 19 ENTITIES I THROUGH X

20 Defendants.

Case No.: 2:19-cv-00687-RFB-0VCF

**STIPULATION AND PROPOSED ORDER
 TO EXTEND DEADLINES UNDER ECF NO.
 13**

(FIRST REQUEST)

21 Plaintiffs A.M., a minor by and through her natural parent and guardian, ZARINAH
 22 MUHAMMAD and ZARINAH MUHAMMAD (“Plaintiffs”) and Defendants CLARK
 23 COUNTY SCHOOL DISTRICT; JESUS JARA; A.J. ADAMS; FELICIA GONZALES; DIANE
 24 LEWIS; and CHRISTOPHER SPARROW (“Defendants”), by and through their attorneys of
 25 record, hereby stipulate and agree pursuant to Local Rule 7-1 as follows:
 26
 27
 28

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

1. Whereas, on March 9, 2020, the Court held a hearing on Defendants’ Motion to Dismiss (ECF No. 4). The Court granted Plaintiffs leave to amend their complaint and ordered Plaintiffs to file the amended complaint by March 30, 2020. ECF No. 13.

2. Whereas, the Court also ordered the parties to file a joint discovery plan/scheduling order by April 6, 2020. ECF No. 13.

3. Whereas, on March 15, 2020 Governor Sisolak announced the closure of all K-12 schools in the State of Nevada; the Governor has since announced a statewide order mandating all non-essential businesses to remain closed for 30 days in light of the Coronavirus pandemic that is affecting the nation.

4. Whereas, the parties are unable to meet the deadlines set by the Court on March 9, 2020 (ECF No. 13) due to the unexpected Coronovirus pandemic and the effects of the same. More specifically, Plaintiffs require additional time to gather information to file an amended complaint and discovery cannot effectively proceed without an amended complaint on file.

5. Whereas, the parties agree to a 30-day extension to the deadlines set by the Court on March 9, 2020 (ECF No. 13). Plaintiffs’ amended complaint would be due April 29, 2020, while the parties’ joint discovery plan/scheduling order would be due May 6, 2020.

...
...
...
...
...
...
...
...
...
...
...

