

1 CLARK COUNTY SCHOOL DISTRICT
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7
 8 **UNITED STATES DISTRICT COURT**
 9 **FOR THE DISTRICT OF NEVADA**

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

13 Plaintiffs,

14 v.

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

19 Defendants.

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

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

(SECOND REQUEST)

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

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

1 Plaintiffs to file the amended complaint by March 30, 2020. ECF No. 13. The Court also ordered
2 the parties to file a joint discovery plan/scheduling order by April 6, 2020, but did not prohibit the
3 parties from renewing a request to stay of discovery. ECF No. 13.

4 2. Whereas, the parties were unable to meet the deadlines set by the Court on March
5 9, 2020 (ECF No. 13) due to the unexpected pandemic and the effects of the same.

6 3. Whereas, the parties agreed and the Court approved a 30-day extension to the
7 deadlines set by the Court on March 9, 2020. ECF Nos. 14 and 15. Plaintiffs' amended complaint
8 would be due April 29, 2020, while the parties' joint discovery plan/scheduling order would be
9 due May 6, 2020.

10 4. Plaintiffs filed an amended complaint on April 30, 2020. ECF No. 18. Defendants
11 are still evaluating the allegations in the amended complaint, but anticipate filing a motion to
12 dismiss. Accordingly, a request to stay discovery pending a decision on the motion may be
13 renewed.

14 5. Whereas, the parties seek an additional two weeks to file a joint discovery
15 plan/scheduling order or request to stay discovery in the case. The deadline would be May 20,
16 2020.

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1 6. Whereas, this is the second request for an extension regarding the filing of a
2 stipulated discovery plan/scheduling order, which is made in good faith, not for the purposes of
3 delay, and neither party is prejudiced by the extension.

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5 DATED: May 6, 2020

DATED: May 6, 2020

6 CLARK COUNTY SCHOOL DISTRICT
OFFICE OF THE GENERAL COUNSEL

JUSTICE FORCE LAW GOUP LLC

7 By: /s/ Crystal J. Herrera

By: /s/ Zarinah J. Muhammad

8 Crystal J. Herrera (#12396)

Zarinah J. Muhammad (#12830)

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Las Vegas, NV, 89148

10 Attorney for the *Defendants*

Attorney for the *Plaintiffs*

11
12
13 **ORDER**

14 **IT IS SO ORDERED.**

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16 RICHARD F. BOULWARE, II
17 UNITED STATES DISTRICT JUDGE

18 DATED this 6th day of May, 2020.
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