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12 *Kelsy Arlitz and Gary Arlitz and Karie Arlitz*
as General Guardians of Kelsy Arlitz

13
14 **UNITED STATES DISTRICT COURT**
15 **DISTRICT OF NEVADA**

16 KELSAY ARLITZ, individually; GARY
17 ARLITZ, as general guardian of ward KELSAY
ARLITZ; KARIE ARLITZ, as general
18 guardian of ward KELSAY ARLITZ,

19 Plaintiffs,

20 vs.

21
22 GEICO CASUALTY COMPANY; DOES 1
through 100 and ROE CORPORATIONS 1
23 through 100, inclusive,

24 Defendants.
25

Case No.: 2:19-cv-00743-RFB-DJA

**STIPULATION AND
[PROPOSED] ORDER TO
EXTEND DEADLINE FOR
PLAINTIFFS TO FILE THEIR
RESPONSE TO DEFENDANT
GEICO CASUALTY COMPANY'S
MOTION FOR SUMMARY
JUDGMENT ON COVERAGE
AND DUTY TO DEFEND (ECF
NO. 50)**

(Third Request)

26 IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs KELSAY
27 ARLITZ, individually; GARY ARLITZ, as general guardian of ward KELSAY ARLITZ,
28 and KARIE ARLITZ, as general guardian of ward KELSAY ARLITZ, through their



1 counsel of record, Dennis M. Prince and Kevin T. Strong of PRINCE LAW GROUP, and
2 Defendant GEICO CASUALTY COMPANY, through its counsel of record, Wade M.
3 Hansard and Jonathan W. Carlson of McCORMICK, BARSTOW, SHEPPARD, WAYTE
4 & CARRUTH LLP, that the deadline for Plaintiffs to file their Response to Defendant
5 GEICO Casualty Company's Motion for Summary Judgment on Coverage and Duty to
6 Defend (ECF No. 50) shall be extended from October 9, 2020 to October 16, 2020. The
7 Motion was filed on August 19, 2020. This is the third request for extension of time for
8 Plaintiffs to file their Response to the Motion. This Stipulation and [Proposed] Order is
9 submitted in accordance with LR IA 6-1.

10 The reason for this brief extension request is because the parties were only
11 recently able to complete the deposition of GEICO claims examiner, Jeremy Rains, on
12 October 7, 2020. Technical difficulties prevented the parties from conducting Mr.
13 Rains's deposition on its previously scheduled date of September 30, 2020. The court
14 reporter represented to the parties that she shall have Mr. Rains's deposition
15 transcribed by Monday, October 12, 2020. Given that Mr. Rains was the primary claims
16 employee involved in the coverage investigation that gives rise to this matter, his
17 deposition testimony is relevant to the issues presented in GEICO's Motion for Summary
18 Judgment. This short extension of time will allow Plaintiffs to present Mr. Rains's
19 deposition to this Court as part of its consideration of GEICO's Motion for Summary
20 Judgment.

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1 Accordingly, the parties respectfully request this Court to approve the foregoing
2 stipulation. Their requested extension is not made in bad faith or to unnecessarily delay
3 these proceedings.

4 DATED this 8th day of October, 2020.

DATED this 8th day of October, 2020

5 **PRINCE LAW GROUP**

**McCORMICK, BARSTOW,
SHEPPARD, WAYTE & CARRUTH
LLP**

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7
8
9 /s/ Kevin T. Strong
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ORDER

IT IS SO ORDERED.



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED this 11th day of October, 2020.

