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

9 TAMMIE KEITH-HENDERSON, an
10 Individual

11 Plaintiff,

12 v.

13 CLARK COUNTY SCHOOL DISTRICT, a
14 political subdivision of the State of Nevada;
DOES I to V; and Roes,

15 Defendants.

CASE NO.: 2:19-cv-01448- RFB-DJA

**STIPULATION AND ORDER TO EXTEND
TIME FOR PLAINTIFF TO FILE HER
OPPOSITION TO DEFENDANT'S
MOTION FOR SUMMARY JUDGMENT**

(Fifth Request)

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17 Plaintiff Tammi Keith-Henderson ("Plaintiff") and Defendant Clark County School
18 District ("Defendant"), by and through their respective counsel of record, hereby stipulate and
19 agree that Plaintiff shall have an extension of time up to and including **Tuesday, September 3,**
20 **2024**, in which to file her opposition to Defendant's Motion for Summary Judgment (ECF No. 77)
21 (filed on June 12, 2024). This Stipulation is submitted and based on Plaintiff's counsel's
22 continuing medical appointments and issues as well as a complete day out of the office due to
23 computer technology issues on Friday, August 23, 2024. Plaintiff's counsel, a sole practitioner,
24 understands that these extensions were of short periods of time, and yet, unexpected issues arose.
25 She worked in earnest on this matter. This case involves a motion for summary judgment, and
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1 Plaintiff's counsel continues to engage in her best efforts. Moreover, opposing counsel, Ms. Foley,
2 has been accommodating and understanding.

3 The background proceedings are as follows:

- 4 1. Defendant filed its motion for summary judgment on June 12, 2024. Thereafter,
5 counsel agreed that Plaintiff could have an extension of time to Wednesday, July 24,
6 2024, for Plaintiff to file her Opposition to Defendant's motion for summary judgment.
7 (ECF No. 79). This Court granted that extension. (ECF No. 80).
- 8 2. Plaintiff's counsel and Defendant's counsel stipulated to a second extension of time for
9 Plaintiff to oppose the Motion for Summary Judgment. (ECF No. 81). The Court
10 ordered that the second Stipulation was granted, and the deadline for Plaintiff to file her
11 opposition to Defendant's motion for summary judgment was thereby extended to
12 Thursday, August 1, 2024. (ECF No. 82).
- 13 3. Plaintiff's counsel requested, and opposing counsel agreed, that the time for Plaintiff to
14 file her opposition to Defendant's motion for summary judgment be extended to
15 Monday, August 12, 2024. This Court granted that extension (ECF No. 84).
- 16 4. Plaintiff's counsel requested, and opposing counsel agreed, that the time for Plaintiff to
17 file her opposition to Defendant's motion for summary judgment be extended to
18 Tuesday, August 20, 2024. This Court granted that extension. (ECF 86).
- 19 5. This is the fifth request for an extension of time for Plaintiff to file her opposition to
20 Defendant's motion for summary judgment.
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6. This request is made in good faith and not for the purpose of delay.

Dated: August 28, 2024.

Dated: August 28, 2024.

CLARK COUNTY SCHOOL DISTRICT
OFFICE OF THE GENERAL COUNSEL

HOLMAN LAW OFFICE

By: /s/Betty J. Foley

By: /s/ Kristina S. Holman

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ORDER
IT IS SO ORDERED.



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED this 29 day of August 2024.