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*Attorney for Defendant,
Lisa Brochu*

1 FELICIA GALATI, Esq.
2 Nevada Bar No. 7341
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*Attorneys for Defendants,
County of Clark, Kim Kallas,
Lisa Ruiz-Lee and Paula Hammack*

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UNITED STATES DISTRICT COURT

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DISTRICT OF NEVADA

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SUSAN HOY, as Guardian Ad Litem for J.M.
and I.M., minors,

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Plaintiffs,
vs,

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ANDREA HERNANDEZ; WALDO
HERNANDEZ; LISA BROCHU; KIM
KALLAS; LISA RUIZ-LEE; PAULA
HAMMACK; DOE Individuals I-X; ROE
CLARK COUNTY DEPARTMENT OF
FAMILY SERVICES EMPLOYEES XI-XX,
individually and in their official capacities;
COUNTY OF CLARK, a political subdivision
of the State of Nevada; and ZOE
CORPORATIONS XXI-XXX,

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Defendants.

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CASE No.: 2:20-cv-00103-CDS-VCF

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**STIPULATION AND ORDER TO EXTEND
TIME FOR DEFENDANTS LISA BROCHU,
LISA RUIZ-LEE, PAULA HAMMACK,
KIM KALLAS, AND COUNTY OF CLARK
TO REPLY TO PLAINTIFF'S
OPPOSITION TO MOTION FOR
SUMMARY JUDGMENT
[ECF NO. 109 & 110]**

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[SECOND REQUEST]

LISA BROCHU, an individual,

Cross-Claimant,

VS,

ANDREA HERNANDEZ, an individual;
WALDO HERNANDEZ, an individual; MOES
1-10, inclusive; and MOE CORPORATIONS
1-10, inclusive.

Cross-Defendants.

ANDREA HERNANDEZ, an individual;
WALDO HERNANDEZ, an individual,

Cross-Claimants,

VS,

LISA BROCHU, an individual,

Cross-Defendant.

Defendant, LISA BROCHU, by and through her counsel of record, Jonathan D. Blum, Esq. of the law firm WILEY PETERSEN, Defendants, COUNTY OF CLARK, KIM KALLAS, LISA RUIZ-LEE, and PAULA HAMMACK, by and through their counsel of record, Felicia Galati, Esq. of the law firm OLSON CANNON GORMLEY & STOBERSKI, (collectively, the “Defendants”), and Plaintiff, SUSAN HOY, by and through her counsel of record, Marjorie Hauf, Esq. and Cara Xidis, Esq. of the law firm H&P LAW (“Plaintiff”) (collectively, the “Parties”) hereby stipulate to extend the deadlines for the Defendants’ replies to [ECF No. 109] Plaintiff’s Opposition to Defendants Clark County, Kim Kallas, Lisa Ruiz-Lee and Paula Hammack’s Motion for Summary Judgment and all Joinders Thereto and [ECF No. 110] Plaintiff’s Opposition to Defendant Lisa Brochu’s Motion for Summary Judgment and all Joinders Thereto by two weeks from Friday, July 29, 2022 to Friday, August 12, 2022.

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1 Counsel for Defendant Brochu will be out of state until August 3, 2022 and has been inundated
2 with time sensitive motion practice over the past weeks. Counsel for County Defendants are traveling
3 for out of state medical appointments has also been dealing with a large volume of litigation deadlines.

4 This stipulated extension is for good cause, and not for improper delay.

5 DATED this 25th day of July, 2022.

6 **H&P LAW**

7 /s/ *Cara Xidis*

8 By: _____
9 MARJORIE HAUF, ESQ.
Nevada Bar No. 8111
10 CARA XIDIS, ESQ.
Nevada Bar No. 11743
11 8950 W. Tropicana Avenue, #1
Las Vegas, Nevada 89147

12 *Attorneys for Plaintiff*

DATED this 25th day of July, 2022

WILEY PETERSEN

/s/ *Jonathan D. Blum*

By: _____
JONATHAN D. BLUM, ESQ.
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Attorneys for Defendant, Lisa Brochu

13 DATED this 25th day of July, 2022

14 **OLSON CANNON GORMLEY &
15 STOBERSKI**

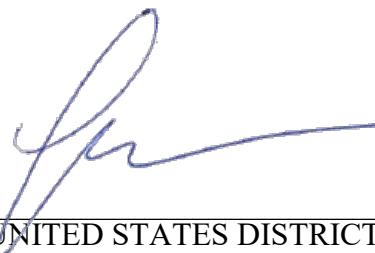
16 /s/ *Felicia Galati*

17 By: _____
FELICIA GALATI, ESQ.
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18 9950 West Cheyenne Avenue
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19 Ph: 702.384.4012

20 *Attorneys for Defendants, County of Clark, Kim
21 Kallas, Lisa Ruiz-Lee, and Paula Hammack*

22 **ORDER**

23 IT IS SO ORDERED.

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25 _____
26 **UNITED STATES DISTRICT JUDGE**
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28 DATED: July 29, 2022