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 10 *Lisa A. Bryant*

11 **UNITED STATES DISTRICT COURT**
 12 **DISTRICT OF NEVADA**

13	LISA A. BRYANT,)	Civil Case No. 2:20-cv-00594-JAD-EJY
14)	
15	Plaintiff,)	
16)	
17	v.)	STIPULATION AND ORDER TO
18)	CONTINUE MOTION TO DISMISS
19	MADISON MANAGEMENT SERVICES,)	RESPONSE DEADLINES
20	LLC, AND PORRAS, PLLC,)	
21)	(FIRST REQUEST)
22	Defendant.)	
23)	
24)	
25)	
26)	

17 Pursuant to Local Rule 7-1, Plaintiff Lisa A. Bryant (“Plaintiff”) and Defendants Madison
 18 Management Services, LLC and Porrass, PLLC (“Lisa A. Bryant”, and together with Defendant, the
 19 “Parties”), by and through their respective undersigned counsel of record, submit this Stipulation and
 20 Proposed Order.
 21

- 22 • Plaintiff filed a Complaint (the “Complaint”) in this Court on March 27, 2020;
- 23 • Defendants filed its Motion to Dismiss on May 20, 2020; and
- 24 • Plaintiff’s opposition is currently due on June 3, 2020.

25 The parties are requesting an extension of at least 30-days. This is the first stipulation for
 26 extension of time to file responses to the Motion to Dismiss filed on May 20, 2020. The Plaintiff is
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 28

1 requesting the extension due to some recent staff changes at Haines & Krieger, LLC and that certain
2 staff members were temporarily limited by their personal situations that were directly impacted by
3 COVID-19.

4 IT IS HEREBY STIPULATED AND AGREED Plaintiff's deadline to file and serve any point
5 and authorities in response to the motion shall be extended 30-days and shall be due on or before July
6 2, 2020.

7
8 IT IS FURTHER STIPULATED AND AGREED Defendant's deadline to file and serve any
9 reply in support of its motion shall be extended by at least 30-days and shall be due on July 9, 2020.

10 Dated: May 29, 2020

Dated: May 29, 2020

11 **HAINES & KRIEGER, LLC**

WALDMAN & PORRAS, PLLC

12
13 By: /s/George Haines

By: /s/Nicholas M. Porras

14 George Haines, Esq. NV Bar 9411

Nicholas M. Porras, Esq. NV Bar 12849

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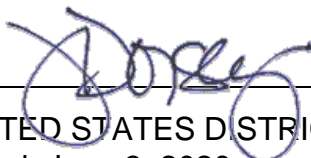
16 Las Vegas, NV 89123

Reno, Nevada 89501

Attorneys for Defendants

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20 **ORDER**

21 IT IS SO ORDERED:

22
23 
24 _____
25 UNITED STATES DISTRICT JUDGE
26 Dated: June 3, 2020.