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*Attorney for Plaintiff*

5  
6 **UNITED STATES DISTRICT COURT**  
7 **DISTRICT OF NEVADA**

8 HELEN BRENNAN, individually  
9 Plaintiff,

10 vs.

11 STATE OF NEVADA ex rel LAS VEGAS  
METROPOLITAN POLICE  
12 DEPARTMENT, a political subdivision of  
the State of Nevada; STATE OF NEVADA  
13 ex rel NEVADA HIGHWAY PATROL, a  
political subdivision of the State of Nevada;  
14 TROOPER L. McCOLL, P#352, an  
individual employed by STATE OF  
15 NEVADA ex rel NEVADA HIGHWAY  
PATROL, a political subdivision of the State  
of Nevada; DOE TROOPERS I through XX,  
16 employed by STATE OF NEVADA ex rel  
NEVADA HIGHWAY PATROL, a political  
17 subdivision of the State of Nevada; DOE  
OFFICERS I through XX, employed by  
18 STATE OF NEVADA ex rel ex rel LAS  
VEGAS METROPOLITAN POLICE  
19 DEPARTMENT, a political subdivision of  
the State of Nevada; DOES I through X; and  
20 ROE Business Entities I through X;  
inclusive,  
21 Defendants.

CASE NO.: 2: 20-cv-00662-RFB-DJA

**STIPULATION AND PROPOSED**  
**ORDER TO EXTEND THE TIME IN**  
**WHICH THE PLAINTIFF MAY**  
**RESPOND TO DEFENDANTS LAS**  
**VEGAS METROPOLITAN POLICE**  
**DEPARTMENT'S MOTION FOR**  
**PARTIAL SUMMARY JUDGMENT ON**  
**PLAINTIFF'S MONELL CLAIM**

**(FIRST REQUEST)**

22  
23 Plaintiff, HELEN BRENNAN and Defendants LAS VEGAS METROPOLITAN  
24 POLICE DEPARTMENT, by and through their respective counsel, hereby stipulate and agree as  
25 follows:

26  
27 1. On May 21, 2021, Defendant, LAS VEGAS METROPOLITAN POLICE  
28 DEPARTMENT filed Defendants Las Vegas Metropolitan Police Department's Motion For

Partial Summary Judgment On Plaintiff's Monell Claim, District of Nevada, designated Case No.,:  
2: 20-cv-00662-RFB-DJA, ECF No. 36.

2. On, May 21, 2021, the court ordered a response due by June 11, 2021.

3. From the time of receiving the Defendant's Motion, Lead Civil Attorney Laura Ungaro had already been on a medical leave from the firm with no return date, and civil paralegal Susie Ward contracted COVID-19 on May 26, 2021 whom is most familiar to this matter.

4. The Plaintiff requested an additional two weeks to get their new Civil Attorney up to speed to this matter to draft the response making the new proposed deadline June 25, 2021.

5. This is the first request for an extension regarding the filing of Plaintiffs response to Defendant's Motion for Partial Summary Judgment, which is made in good faith, not for the purposes of delay, and neither party is prejudiced by the short extension.

DATED this 3<sup>rd</sup> day of June, 2021.

DATED this 3<sup>rd</sup> day of June, 2021.

MUELLER & ASSOCIATES, INC.

KAEMPFER CROWELL

*/s/ Craig A. Mueller, Esq.*

*/s/ Lyssa S. Anderson, Esq.*

CRAIG A. MUELLER, ESQ.

LYSSA S. ANDERSON, ESQ.

Nevada Bar No. 4703

Nevada Bar No. 5781

808 South Seventh Street

1980 Festival Plaza Drive, Suite 650

Las Vegas, NV 89101


Las Vegas, NV 89135

*Attorney for Plaintiff*

*Attorney for Las Vegas Metropolitan  
Police Department*

IT IS SO ORDERED.

DATED this 4th day of June, 2021.

  
\_\_\_\_\_  
**RICHARD E. BOULWARE, II**  
**United States District Court**

**From:** [Lyssa Anderson](#)  
**To:** [Susie Ward](#)  
**Subject:** RE: Brennan- Extension Request  
**Date:** Thursday, June 3, 2021 12:44:38 PM

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Susie,

You may use my e-signature to file.



Lyssa S. Anderson  
Kaempfer Crowell  
1980 Festival Plaza Drive, Suite 650  
Las Vegas, NV 89135-2958  
Tel: (702) 792-7000  
Fax: (702) 796-7181  
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**From:** Susie Ward [<mailto:Susie@craigmuellerlaw.com>]  
**Sent:** Thursday, June 3, 2021 12:22 PM  
**To:** Lyssa Anderson  
**Subject:** RE: Brennan- Extension Request

Please review the attached proposed order, thank you for this.

Sincerely,

*Susie Ward*

Paralegal,  
Mueller and Associates  
th

808 S. 7 Street  
Las Vegas, NV 89101  
P- 702-382-1200  
F- 702-637-4817  
[susie@craigmuellerlaw.com](mailto:susie@craigmuellerlaw.com)

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**From:** Lyssa Anderson <landerson@kcnvlaw.com>  
**Sent:** Thursday, June 3, 2021 10:37 AM  
**To:** Susie Ward <Susie@craigmuellerlaw.com>  
**Subject:** Re: Brennan- Extension Request

That's fine. Please send us a proposed stipulation.

Hope you are well.

Best Regards,  
Lyssa S. Anderson

On Jun 3, 2021, at 10:32 AM, Susie Ward <[Susie@craigmuellerlaw.com](mailto:Susie@craigmuellerlaw.com)> wrote:

Lyssa,

Would you stipulate to an extension on our opposition for two weeks making it due the 25<sup>th</sup> if the court will allow it? I am out on quarantine and Laura Ungaro is not coming back to the firm for medical issues. I just finally got a new civil attorney that needs to get up to speed on this matter. Please let me know so I can get the stipulation to you, thank you.

Sincerely,

*Susie Ward*

Paralegal,  
Mueller and Associates  
808 S. 7<sup>th</sup> Street  
Las Vegas, NV 89101  
P- 702-382-1200  
F- 702-637-4817  
[susie@craigmuellerlaw.com](mailto:susie@craigmuellerlaw.com)

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