

BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, NV 89106-4614
702.382.2101

1 Patrick J. Reilly, Esq.
Nevada Bar No. 6103
2 Connor H. Shea, Esq.
Nevada Bar No. 14616
3 BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway
4 Suite 1600
Las Vegas, NV 89106-4614
5 Telephone: 702.382.2101
Facsimile: 702.382.8135
6 preilly@bhfs.com
cshea@bhfs.com

7 *Attorneys for Charles C. Brennan*
8 *and Mary Brennan*

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

13 CHARLES C. BRENNAN, an individual;
and MARY BRENNAN, an individual,

14 Plaintiffs,

15 v.

16 CADWELL SANFORD DEIBERT &
17 GARRY LLP, a South Dakota limited-
liability partnership; CUP O’DIRT LLC, a
18 South Dakota limited-liability company;
DOES I through X, inclusive; and ROE
19 ENTITIES I through X, inclusive,

20 Defendants.

Case No.: 2:20-cv-00799-JAD-VCF

**STIPULATION AND ORDER TO EXTEND
TIME TO FILE: (I) OPPOSITION; AND
(II) REPLY TO DEFENDANT CADWELL
SANFORD DEIBERT AND GARRY, LLP’S
MOTION TO STAY DISCOVERY (ECF 31)
(SECOND REQUEST)**

22 **STIPULATION**

23 Charles C. Brennan and Mary Brennan (collectively referred to herein as the “Plaintiffs”),
24 Defendant Cadwell Sanford Deibert & Garry LLP (“Defendant Cadwell”), and Defendant Cup
25 O’Dirt LLC (“Defendant COD”) by and through their respective counsel of record, hereby stipulate
26 and agree to extend the deadline for Plaintiffs to file an opposition brief to Defendant Cadwell’s
27 Motion to Stay Discovery (the “Motion”) (ECF 31) as well Defendant Cadwell’s deadline to file a
28 reply brief to the Plaintiffs’ opposition, as follows:

BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, NV 89106-4614
702.382.2101

1 WHEREAS, on June 30, 2020, Defendant Cadwell filed the Motion (ECF 31);

2 WHEREAS, on June 30, 2020, Defendant COD filed a joinder to the Motion (ECF 32);

3 WHEREAS, the parties agreed, and this Court ordered, to extend the briefing deadline for
4 Plaintiffs to file an opposition to July 21, 2020, and Defendant, Cadwell, to file a reply to July 28,
5 2020 (ECF No. 35);

6 WHEREAS, unexpected matters arose for counsel for Plaintiffs, interfering with the
7 deadlines above;

8 WHEREAS, the undersigned parties desire to extend the deadline for a second time for:
9 (i) the Plaintiffs to file an opposition to the Motion; and (ii) Defendant Cadwell’s concomitant
10 deadline to file a reply to the Plaintiffs’ opposition, by a period of one week, respectively, as
11 counsel for the Plaintiffs require additional time due to deadlines in other cases and time for the
12 clients to review and approve the reply;

13 WHEREAS, this is the parties’ second request for extension of these deadlines and the
14 request is not made in bad faith or to delay these proceedings unnecessarily.

15 NOW, THEREFORE, the parties hereby stipulate and agree to the following and seek
16 Court approval of the same:

17 IT IS HEREBY STIPULATED AND AGREED that the Plaintiffs shall file their
18 opposition to the Motion on or before July 28, 2020;

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 IT IS HEREBY STIPULATED AND AGREED that Defendant Cadwell shall file
2 its reply to the Plaintiffs' opposition to the Motion on or before August 4, 2020.

3 Dated this 21st day of July, 2020.

Dated this 21st day of July, 2020.

4 /s/ Patrick J. Reilly
5 Patrick J. Reilly, Esq.
6 Connor H. Shea, Esq.
7 **BROWNSTEIN HYATT FARBER**
8 **SCHRECK, LLP**
9 100 North City Parkway, Suite 1600
10 Las Vegas, NV 89106-4614
11 Telephone: 702.382.2101
12 Facsimile: 702.382.8135
13 preilly@bhfs.com
14 cshea@bhfs.com

/s/ Sheri M. Thome
Sheri M. Thome, Esq.
Nevada Bar No. 008657
WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP
6689 Las Vegas Blvd. South, Suite 200
Las Vegas, NV 89119
Telephone: 702.727.1400
Facsimile: 702.727.1401
EmailBrenna: Sheri.Thome@wilsonelser.com

15 *Attorneys for Charles C. Brennan*
16 *and Mary Brennan*

Attorneys for Defendant
Cadwell Sanford Deibert & Garry LLP

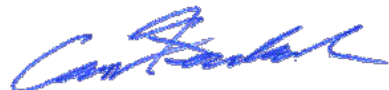
17 Dated this 21st day of July, 2020.

18 /s/ Mark J. Connot
19 Mark J. Connot, Esq.
20 Nevada Bar No. 10010
21 **FOX ROTHSCHILD LLP**
22 1980 Festival Plaza Drive, #700
23 Las Vegas, Nevada 89135
24 (702) 262-6899 tel
25 (702) 597-5503 fax
26 mconnot@foxrothschild.com

27 *Attorneys for Defendant Cup O'Dirt LLC*

28 **ORDER**

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: 7-22-2020

BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, NV 89106-4614
702.382.2101