

1 ROBERT W. FREEMAN
 Nevada Bar No. 3062
 2 E-Mail: Robert.Freeman@lewisbrisbois.com
 CHERYL A. GRAMES
 3 Nevada Bar No. 12752
 E-Mail: Cheryl.Grames@lewisbrisbois.com
 4 LEWIS BRISBOIS BISGAARD & SMITH LLP
 6385 S. Rainbow Boulevard, Suite 600
 5 Las Vegas, Nevada 89118
 TEL: 702.893.3383
 6 FAX: 702.893.3789
*Attorneys for Defendant State Farm Mutual
 Automobile Insurance Company*

8 **UNITED STATES DISTRICT COURT**
 9 **DISTRICT OF NEVADA, SOUTHERN DIVISION**

10 ***

11 GINA CASTRONOVO-FLIHAN,
 12 Plaintiff,
 13 vs.
 14 STATE FARM MUTUAL AUTOMOBILE
 INSURANCE COMPANY, a foreign
 15 company; AND DOES I through V, inclusive
 16 Defendants.

CASE NO. 2:20-cv-1197-JCM-DJA

**STIPULATION AND ORDER
 TO EXTEND TIME FOR DEFENDANT
 TO FILE REPLY TO PLAINTIFF'S
 RESPONSE (ECF No. 45) TO
 DEFENDANT'S MOTION FOR PARTIAL
 SUMMARY JUDGMENT (ECF No. 40)
 (SECOND REQUEST)**

17 Plaintiff Gina Castronovo-Flihan ("Plaintiff"), by and through her undersigned counsel of
 18 record, and Defendant State Farm Mutual Automobile Insurance Company ("Defendant"), by and
 19 through its undersigned counsel of record, hereby stipulate and agree, subject to the Court's
 20 approval, as follows:

- 21 1. On September 15, 2022, Defendant filed a Motion for Partial Summary Judgment
 22 Pursuant to FRCP 56(d) (ECF No. 40);
- 23 2. By stipulation and order, the deadline for Plaintiff's Response was extended from
 24 October 6, 2022 to October 17, 2022 and the deadline for Defendant's Reply in support of its
 25 Motion for Partial Summary Judgment was extended to October 31, 2022 (ECF No. 45).
 26
- 27 3. Plaintiff timely filed her Response (ECF No. 46) on October 17, 2022.

1 4. Based on the issues at bar in the parties' briefing thus far, Defendant requires
2 additional time to file its reply brief, through and including November 7, 2022.

3 The parties bring this stipulated request for an extension of the briefing schedule in good
4 faith, they do not interpose it for delay, and they do not file it for an improper purpose. This is the
5 second stipulation for extension of time to file Defendant's Reply to Plaintiff's Opposition to
6 Defendant's Motion for Partial Summary Judgment Pursuant to FRCP 56(d).

7 DATED this 26th day of October 2022.

MCMENEMY | INJURY LAW PLLC

/s/ Ian M. McMenemy

IAN M. MCMENEMY, ESQ.
Nevada Bar No. 13190
8880 W. Sunset Road, Suite 130
Las Vegas, NV 89148
*Attorney for Plaintiff GINA CASTRONOVO-
FLIHAN*

14 DATED this 26th day of October 2022.

**LEWIS BRISBOIS BISGAARD &
SMITH LLP**

/s/ Cheryl A. Grames

ROBERT W. FREEMAN
Nevada Bar No. 3062
CHERYL A. GRAMES
Nevada Bar No. 12752
6385 S. Rainbow Boulevard, Suite 600
Las Vegas, Nevada 89118
*Attorneys for Defendant STATE FARM
MUTUAL AUTOMOBILE INSURANCE
COMPANY*

ORDER

IT IS SO ORDERED.

DATED October 28, 2022.

James C. Mahan

UNITED STATES DISTRICT JUDGE