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

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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

**PROPOSED STIPULATION AND ORDER
 TO EXTEND TIME FOR THE PARTIES
 TO FILE THE JOINT PRE-TRIAL
 ORDER**

(SECOND REQUEST)

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 18 Plaintiff GINA CASTRONOVO-FLIHAN (“Plaintiff”), by and through her undersigned
 19 counsel of record, and Defendant STATE FARM MUTUAL AUTOMOBILE INSURANCE
 20 COMPANY (“Defendant”), by and through its undersigned counsel of record, hereby stipulate and
 21 agree, subject to the Court’s approval, as follows:

22 1. On September 22, 2023, this Court entered an Order [40] Granting Motion for
 23 Partial Summary Judgment. (ECF No. 54).

24 2. On October 19, 2023, Plaintiff and Defendant conducted a meet and confer to
 25 discuss the Joint Pre-Trial Order.

26 3. The parties have been working diligently and have held a thorough meet and confer
 27 to discuss the Joint Pre-Trial Order. However, there are certain issues the parties are negotiating
 28 that will likely not be completed, insofar as verbiage on the contentions and discussions for exhibits

1 or factual stipulations, by the current due date of the Joint Pre-Trial Order on October 25, 2023.

2 4. On October 26, 2023, this court entered an Order [58] extending time for the parties
3 to file the Joint Pre-Trial Order.

4 5. The parties have completed a first working draft of the proposed Joint Pre-Trial
5 Order, following their meet and confer.

6 6. Plaintiff has provided a revised draft for Defendant review. Based on the length and
7 scope of additions, Defense counsel requires a brief enlargement of time to review the latest version
8 with client and to finalize for submission to Court.

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