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 6

7 **UNITED STATES DISTRICT COURT**  
 8 **DISTRICT OF NEVADA**

9 DONALD MARQUEZ,	)	CASE NO.: 2:20-cv-01247-JAD-EJY
	)	
10 Plaintiff,	)	STIPULATION AND ORDER FOR
	)	THIRTY (30) DAY EXTENSION OF
11 vs.	)	TIME FOR PLAINTIFF TO FILE
	)	OPPOSITION TO MOTION FOR
12 SAFECO INSURANCE COMPANY OF	)	SUMMARY JUDGMENT
ILLINOIS	)	
	)	
13 Defendant.	)	[FIRST REQUEST]
	)	
	)	ECF No. 22
	)	
	)	

16 **COME NOW**, Plaintiff, DONALD MARQUEZ (hereinafter "Plaintiff"), by and through  
 17 his attorneys of record, Kevin Spreng, Esq., of SPRENZ LAW, and Defendant SAFECO  
 18 INSURANCE COMPANY OF ILLINOIS (hereinafter also referred to as "Safeco" or  
 19 "Defendant"), by and through its attorneys, the law firm of KOELLER, NEBEKER, CARLSON  
 20 & HALUCK, LLP, and hereby submit this joint stipulated request to extend the time for Plaintiff  
 21 to file his Opposition to Defendant's Motion for Partial Summary Judgment for thirty (30) days.

22 This request to extend time to file Plaintiff's Opposition is to allow the parties to further  
 23 discuss settlement and/or stipulate to an Alternative Dispute Resolution.

24 **A. Statement Supporting the Necessity of Extending Dates**

25 This extension is necessary to allow the parties to further address possible settlement  
 26 parameters and/or the option of pursuing a binding Alternative Dispute Resolution. Counsel for  
 27 both parties have engaged in meaningful discussions and believe it would be in the best interest  
 28 of the parties – and this court – to extend the briefing deadline for thirty (30) days to facilitate

1 those discussions. The parties have a good faith belief that a partial or complete resolution will  
2 be agreed to within the next few weeks, thus saving time and resources of all involved.

3 **B. Proposed Revised Briefing Schedule**

4 With a thirty (30) day extension for Plaintiff to file his Opposition to Defendant's Motion  
5 for Partial Summary Judgment, the new Opposition filing date will be **May 2, 2022**. With  
6 Defendant's Reply being due **May 16, 2022**.

7 DATED this 31st day of March, 2022.

DATED this 31st day of March, 2022

8 KOELLER, NEBEKER, CARLSON  
& HALUCK, LLP

SPRENZ LAW

9 By: /s/ Andrew C. Green, Esq.  
10 ANDREW C. GREEN, ESQ.  
Nevada Bar No. 9399  
11 VALENTINE C. VIDAL, ESQ.  
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SAFECO INSURANCE COMPANY  
14 OF ILLINOIS

By: /s/ Kevin A. Sprenz, Esq.  
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Las Vegas, NV 89129  
Attorneys for Plaintiffs,  
DONALD MARQUEZ

15 **ORDER**

16 **IT IS SO ORDERED.**

17   
18 U.S. District Judge Jennifer A. Dorsey  
Dated: April 6, 2022

19 Respectfully Submitted by:

20 SPRENZ LAW

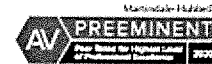
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26 DONALD MARQUEZ

**From:** [Kevin Sprenz](#)  
**To:** [Trinidad Acosta-Christon](#)  
**Subject:** FW: Stipulation and Order for Extension to OPP.docx  
**Date:** Thursday, March 31, 2022 4:16:49 PM  
**Attachments:** [image003.png](#)  
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[image002.png](#)

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Please file : )

*Kevin A. Sprenz, Esq.*



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**From:** Andrew C. Green [mailto:[andrew.green@knchl.com](mailto:andrew.green@knchl.com)]  
**Sent:** Thursday, March 31, 2022 4:14 PM  
**To:** Kevin Sprenz <[ksprenz@sprenzlaw.com](mailto:ksprenz@sprenzlaw.com)>  
**Subject:** Stipulation and Order for Extension to OPP.docx

Here this is with those couple adjustments I mentioned on the phone. You can use my e-signature.  
Thanks again. Andrew

**Andrew C. Green**  
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