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 10 Telephone: (703) 321-8510

11 Attorneys for Plaintiff

12 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

13 MELODIE DEPIERRO, an individual,  
 14 Plaintiff,

15 v.

16 LAS VEGAS POLICE PROTECTIVE  
 ASSOCIATION METRO, INC., a Nevada non-  
 17 profit corporation; and LAS VEGAS  
 METROPOLITAN POLICE DEPARTMENT, a  
 18 political subdivision of the State of Nevada,  
 Defendants.

Case No.: 20-cv-01481-GMN-VCF

**STIPULATION, REQUEST, AND ORDER**  
**EXTENDING TIME TO FILE REPLIES**

**Constitutional Violation Action**  
**(42 U.S.C. § 1983), Declaratory Judgment,**  
**Injunctive Relief, Compensatory and**  
**Nominal Damages.**

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 20 Plaintiff Melodie DePierro (“DePierro”), Defendant Las Vegas Police Protective Association  
 21 Metro, Inc. (“LVPPA”), and Defendant Las Vegas Metropolitan Police Department (“LVMPD”),  
 22 by and through their respective counsel, respectfully submit the following Stipulation, Request, and  
 23 Order Extending the Time for DePierro to Reply to LVPPA’s Opposition to DePierro’s Motion for  
 24 Summary Judgment, for LVMPD to Reply to DePierro’s Opposition to LVMPD’s Motion for  
 25 Summary Judgment, and for LVPPA to Reply to DePierro’s Opposition to LVPPA’s Motion for  
 26 Summary Judgment. This Stipulation is made pursuant to LR IA 6-1, LR IA 6-2, and LR II 7-1 of the  
 27 Local Rules of this Court.  
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1 DePierro's Motion for Summary Judgment was filed on April 21, 2021 (Dkt. 33). LVMPD filed  
2 its Opposition to DePierro's Motion for Summary Judgment on May 4, 2021 (Dkt. 36). LVPPA's  
3 Opposition to DePierro's Motion for Summary Judgment was filed on May 11, 2021 (Dkt. 37). DePierro  
4 replied to LVMPD's Opposition to her Motion for Summary Judgment on May 18, 2021 (Dkt. 42).  
5 DePierro intends to reply to LVPPA's Opposition to her Motion for Summary Judgment.

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7 LVMPD filed its Motion for Summary Judgment on April 21, 2021 (Dkt. 29). DePierro filed her  
8 Opposition to LVMPD's Motion for Summary Judgment on May 12, 2021 (Dkt. 41). LVMPD intends to  
9 reply to DePierro's Opposition to its Motion for Summary Judgment.

10 LVPPA filed its Motion for Summary Judgment on April 21, 2021 (Dkt. 32). DePierro filed her  
11 Opposition to LVPPA's Motion for Summary Judgment on May 12, 2021 (Dkt. 40). LVPPA intends to  
12 reply to DePierro's Opposition to its Motion for Summary Judgment.  
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1 Dated: May 25, 2021

2 *s/Ángel J. Valencia*  
3 Ángel J. Valencia, Esq.  
4 *(Pro Hac Vice)*  
5 Milton L. Chappell, Esq.  
6 *(Pro Hac Vice)*

**The Law Office of Georlen K. Spangler**

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7 Georlen K. Spangler, Esq. (NV Bar No. 3818)  
8 Stephen A. Davis, Esq. (NV Bar No. 14185)

9 Attorneys for Plaintiff Melodie DePierro

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13 **McCRACKEN, STEMERMAN & HOLSBERY**

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14  
15 *s/ Richard G. McCracken*  
16 Richard G. McCracken, Esq. (SBN 2748)  
17 *s/ Kimberley C. Weber*  
18 Kimberley C. Weber, Esq. (SBN 14434)  
19 1630 S. Commerce Street, Suite A-1  
20 Las Vegas, NV 89102  
21 *Attorneys for Defendant Las Vegas Police Protective*  
22 *Association Metro, Inc.*

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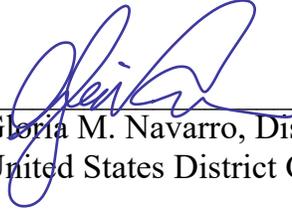
23 *s/Nick D. Crosby*  
24 Nick D. Crosby, Esq.  
25 Nevada Bar No. 8996  
26 **MARQUIS AURBACH COFFING**  
27 10001 Park Run Drive  
28 Las Vegas, Nevada 89145  
*Attorney for Defendant Las Vegas Metropolitan Police*  
*Department*

1 The instant extension is requested as counsel for the parties require additional time to  
2 prepare their respective replies. Upon agreement between all the parties, the  
3 undersigned respectfully requests that the Court grant an extension of time until June 7,  
4 2021 for DePierro to file her Reply to LVPPA's Opposition to her Motion for Summary  
5 Judgment, and for LVPPA and LVMPD to file their respective replies to DePierro's  
6 Oppositions to LVPPA's and LVMPD's Motions for Summary Judgment.  
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8 **ORDER**  
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12 IT IS SO ORDERED *nunc pro tunc*.

13 Dated this 3 day of June, 2021.  
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18 Gloria M. Navarro, District Judge  
19 United States District Court  
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1 **CERTIFICATE OF SERVICE**

2 I certify that on May 25, 2021, the aforementioned *Stipulation, Request, and Order Extending Time to*  
3 *File Replies* was filed electronically in this case. Notice of this filing will be sent by e-mail to all parties  
4 by operation of the Court’s electronic filing system or by mail to anyone unable to accept electronic filing  
5 as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court’s CM/ECF  
6 System.

7 /s/ Ángel J. Valencia  
8 ÁNGEL J. VALENCIA  
9 *Counsel for Plaintiff Melodie DePierro*

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